

# PUBLISHED NOTICE OF PROVIDER DEFENDANT CLASS ACTION SETTLEMENT

**If you are a JUVENILE who appeared before former  
Judge Mark A. Ciavarella Jr. at any time  
from January 1, 2003 through May 28, 2008**

**--- OR ---**

**If you are the PARENT/GUARDIAN OF A JUVENILE who appeared before former  
Judge Ciavarella during this time,  
YOU COULD RECEIVE BENEFITS FROM A SETTLEMENT  
with PA Child Care, LLC; Western PA Child Care, LLC;  
and Mid-Atlantic Youth Services Corp.**

A partial settlement has been entered into on behalf of juvenile and parent/guardian Settlement Class Members with PA Child Care, LLC ("PACC"); Western PA Child Care, LLC ("WPACC"); and Mid-Atlantic Youth Services Corp. ("MAYS") (referred to in this notice as the "Provider Defendants"). The Provider Defendants will pay \$2.5 million into a Cash Settlement Fund in three installments. This Notice is a description of important terms of the Master Settlement Agreement ("MSA" or "Agreement"), but it does not set forth every term of that Agreement or modify that Agreement. You may obtain a copy of the entire MSA or the Mailed Notice with more detail at [www.kidswinsettlement.com](http://www.kidswinsettlement.com).

If you believe you qualify to receive a payment as part of this settlement, you may submit a Proof of Claim form to participate in this partial settlement, exclude yourself from the settlement, or object to it.

The United States District Court for the Middle District of Pennsylvania authorized this notice. The Court will have a hearing to consider whether to approve this settlement, so that the benefits may be paid.

## WHO'S INCLUDED?

You are a Juvenile Settlement Class Member or Parent/Guardian Settlement Class Member, as defined in the MSA, if you fall into either of the following groups:

- **Juvenile Settlement Class Members:** all juveniles who appeared before former Judge Ciavarella at any time between January 1, 2003 and May 28, 2008 and who were adjudicated delinquent and/or placed in a detention center by former Judge Ciavarella.
- **Parent Settlement Class Members:** all parents and/or legal guardians of Juvenile Settlement Class Members who made payments in their own name as a result of his or her child's adjudication or placement and who did not receive full compensation for payments made in their name in the Mericle Settlement.

## WHAT'S THIS ABOUT?

Various class action lawsuits and individual lawsuits were filed against the Provider Defendants and other defendants. The lawsuits allege that the Provider Defendants and other defendants violated the Juveniles' constitutional rights, the Racketeer Influenced and Corrupt Organizations Act ("RICO"), and Pennsylvania law.

**This settlement resolves all claims against the Released Parties, which includes the Provider Parties and Zappala Parties.** The Provider Defendants have not admitted to doing anything wrong, and the Court has not found that the Provider Defendants have done anything wrong. However, the Provider Defendants wish to enter into this MSA to release the Released Parties, as defined in the MSA, from any potential liability and to end all further litigation by the Juveniles and the Parents against these parties.

The class action and individual lawsuits will continue against certain Non-Released Parties, as defined in the MSA, including the former Judges Ciavarella and Conahan, Robert Powell, and Vision Holdings, LLC.

## HOW DO I RECEIVE A PAYMENT?

You must submit a Proof of Claim form to the Claims Committee in order to receive a payment. You will also have to sign a Release Form to authorize the Claims Committee to order records to verify your information and calculate your payment.

The Proof of Claim Form must be mailed so that it is physically received by the Claims Committee by the Proof of Claim deadline: January 21, 2014. You will not be permitted to participate in the Settlement if you miss this deadline.

## HOW MUCH WILL I RECEIVE?

<u>Settlement Class Category</u>	<u>Base Point Award</u>
1. Probation Only .....	1 Point*
2. Non-PACC/WPACC.....	2 Points*
[if you were adjudicated & placed in a facility other than PACC/WPACC]	
3. PACC/WPACC .....	5 Points*
[if you were adjudicated and placed in PACC and/or WPACC for any period of time, you fall in this category]	

\* The value of each point will depend on the number of Juvenile Class Members who participate in the Settlement. The total number of points for all Juvenile Settlement Class Members will be divided into the Juvenile Fund to determine the monetary value of each point.

## 4. Parents/Guardians .....

actual amount paid\*\*  
\*\*Parents/guardians will only be reimbursed for payments made in their name for which they have not yet received compensation. If the actual amount of awards exceeds the amount allotted for parents/guardians under the plan of allocation, parent/guardian will receive a pro-rata share of their actual award. See [www.kidswinsettlement.com](http://www.kidswinsettlement.com) for complete explanation.

## WHAT ARE MY OTHER OPTIONS?

If you do not want to be legally bound by this settlement, you must exclude yourself – or opt-out – by the Proof of Claim deadline: January 21, 2014. If you opt-out, you cannot get money from this settlement and may continue individually to proceed against the Provider Defendants. If you want to be included in the settlement but do not agree to all the terms, you can object. The complete Notice describes how to opt-out or object.

## FOR COMPLETE INFORMATION

For more information, visit [www.kidswinsettlement.com](http://www.kidswinsettlement.com), call toll-free 1-866-510-3030, or write to:

Provider Defendants Settlement Claims Committee  
Anapol Schwartz  
1710 Spruce Street, Philadelphia, PA 19103