

FARUQI & FARUQI, LLP
Benjamin Heikali (SBN 307466)
Joshua Nassir (SBN 318344)
10866 Wilshire Boulevard, Suite 1470
Los Angeles, CA 90024
Telephone: (424) 256-2884
Facsimile: (424) 256-2885
E-mail: bheikali@faruqilaw.com
jnassir@faruqilaw.com

THE WAND LAW FIRM, P.C.
Aubry Wand (SBN 281207)
400 Corporate Pointe, Suite 300
Culver City, California 90230
Telephone: (310) 590-4503
Facsimile: (310) 590-4596
E-mail: awand@wandlawfirm.com

FARUQI & FARUQI, LLP
Timothy J. Peter (admitted *pro hac vice*)
1617 JFK Boulevard, Suite 1550
Philadelphia, PA 19103
Telephone: (215) 277-5770
Facsimile: (215) 277-5771
E-mail: tpeter@faruqilaw.com

Attorneys for Plaintiffs and the Settlement Class

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

THEODORE BROOMFIELD, *et al.*,

Plaintiffs,

v.

CRAFT BREW ALLIANCE, INC.,

Defendant.

CASE NO.: 5:17-cv-01027-BLF

**SUPPLEMENTAL DECLARATION OF
ANI S. SARICH ON BEHALF OF CPT
GROUP, INC. WITH RESPECT TO
CLAIMS VALIDATION**

1 I, Ani S. Sarich, declare as follows:

2 1. I am a Senior Case Manager for CPT Group, Inc. (“CPT”), the Settlement
3 Administrator jointly agreed upon by the Parties and approved by the Court for the *Broomfield, et*
4 *al. v. Craft Brew Alliance, Inc.* Settlement. I have personal knowledge of the facts set forth in this
5 declaration and, if called upon to testify, I could and would testify competently to such facts.

6 2. As of the expiration of the claim deadline, CPT received a total of 159,065 Claim
7 Forms from potential Settlement Class Members. This figure was reported in my October 28,
8 2019 declaration (ECF No. 138).

9 3. I submit this supplemental declaration to provide the Court with final details
10 regarding verification of the 159,065 Claim Forms received by CPT. After verifying the Claim
11 Forms (i.e., removing fraudulent and duplicative Claim Forms), there are a total of 143,078 valid
12 Claim Forms. Details regarding the process CPT implemented to verify the Claim Forms, and a
13 breakdown of the final number of valid Claim Forms and dollar values claimed, are set forth
14 below.

15 **CLAIMS VERIFICATION**

16 4. CPT performed a review of the 159,065 Claim Forms and identified 2,181
17 potentially fraudulent claims, consistent with its obligations pursuant to paragraph 84 of the
18 *Settlement Agreement*, which directed CPT to “use good faith and appropriate procedures to
19 prevent, detect, and reject the payment of Fraudulent Claims¹ and ensure payment of only
20 legitimate claims.”

21 5. As part of CPT’s standard process of verification of claims, multiple factors are
22 examined and considered when determining whether or not a claim is duplicative and/or
23 fraudulent. Examples of the criteria CPT employed when reviewing Claim Forms for fraud, as
24 well as demonstrative examples of each, are set forth below. So as not to publicly file any

25 _____
26 ¹ “Fraudulent Claims” are defined as “Claim Forms the Settlement Administrator determines
27 in good faith contain indicia of fraud, deceit or other invalidity, including but not limited to
28 any attempt to bypass the terms and limitations set out in this Agreement regarding Claim
Forms, Claimants, Settlement Class Members and Settlement Benefits. Settlement
Agreement at ¶ 52.

1 information that could be considered private, certain information (e.g., names, addresses, IP
 2 addresses, etc.) has been omitted, abbreviated, or simply described. CPT has a file that contains
 3 detailed information regarding the Claim Forms deemed fraudulent and is willing and able to
 4 provide it to the Court under seal, if the Court would like to examine it.

- 5 a) More than one Claim Form appeared to be fraudulently submitted by the same
 6 person because there were slight variations with the name, but the address was the
 7 same. For example, CPT received 76 Claim Forms with minor variations on the
 8 same name, but which had the same addresses. Only five of these Claim Forms are
 9 described below:

Name	Mailing Address
th tommy james hubbard	Identical
tomme thomas j james hubbard	Identical
tjh tomas jams hubbard sr	Identical
tom james tj hubbard sr tjh	Identical
tommy james hubbard sr	Identical

- 12 b) More than one Claim Form appeared to be fraudulently submitted by the same
 13 person because the name was the same, but there were slight variations with the
 14 address. For example, CPT received 52 Claim Forms with minor variations on the
 15 same address, but which had the same name. Only five of these Claim Forms are
 16 described below:

Name	Mailing Address
John Doe	9187 suite#6-559 Clairemont Mesa Bl
John Doe	9187 Clairemont Mesa Bl suite6 box444
John Doe	9187 6-444 Clairemont Mesa Blvd
John Doe	3077 Clairemont Drive #102-Box346
John Doe	3077 Ste#102/Box#346 Clairemont Dr

- 17 c) Multiple Claim Forms where the name and IP address were identical but the email
 18 address contained minor sequential differences. For example, CPT received 39
 19 Claim Forms with the same name and IP address, which had sequential differences
 20 in the email address. Only five of these Claim Forms are described below:

Name	Email Address	IP Address
George R.	ca6265+11@----- .com	Identical
George R.	ca6265+12@----- .com	Identical
George R.	ca6265+13@----- .com	Identical
George R.	ca6265+14@----- .com	Identical
George R.	ca6265+15@----- .com	Identical

- 1 d) Instances where over 15 Claim Forms were submitted from the same physical
2 mailing address. For example, 95 Claim Forms were submitted under different
3 names, the same physical address, the same IP address and different email addresses,
4 some with only a slight variation. Only five of these Claim Forms are described
5 below:

Name	Mailing Address	Email	IP Address
Wanda H.	Identical	Unique	Identical
Fiona K.	Identical	Unique	Identical
Trevor G.	Identical	Unique	Identical
Joanne H.	Identical	Unique	Identical
Rebecca M.	Identical	Unique	Identical

6 Pursuant to paragraph 84 of the *Settlement Agreement*, CPT sent an email to each
7 claimant that fell into the categories listed in paragraph 5 above and requested that he or she
8 validate the email address on file to avoid rejection of their claim. This process served as an
9 opportunity for these claimants to verify their Claim Forms. Claimants were provided ten (10)
10 days to dispute the rejection.

11 7. As of the date of this declaration, 429 of the 2,181 claimants who potentially
12 submitted fraudulent claims have responded to CPT's notification. Therefore, these claims are no
13 longer considered fraudulent or invalid. Based on CPT's experience, and having received no
14 response from the other claimants, the remaining 1,752 claims have been deemed invalid.

15 8. After invalidation of the fraudulent claims, CPT identified 14,235 Claim Forms as
16 duplicate submissions from the same Class Member but which did not appear to be fraudulent.

17 9. CPT notified the Parties of these duplicative claims. The Parties met and conferred,
18 and advised CPT to do the following:

- 19 a) For Option A claims (without proof of purchase), submitted by the same
20 individual and in the amount of the \$10 maximum, CPT accepted the most recent
21 Claim Form submitted.
- 22 b) For Option A claims, filed by the same individual and in an amount less than
23 \$10, CPT calculated the award to be up to the lesser of the total of the Claim
24 Forms, or the \$10 maximum.

1 c) For claimants who filed Claim Forms for Option A and Option B (with proof of
2 purchase), CPT accepted the Claim Form with the highest payout, up to the \$20
3 maximum.

4 **CONCLUSION**

5 10. After removing the fraudulent and duplicative claims as described above, there are
6 143,078 Settlement Class Members who have submitted valid Claim Forms.

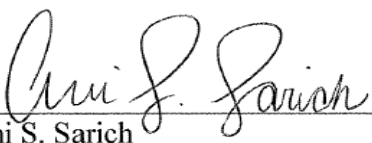
7 11. A breakdown of the valid Claim Forms is as follows:

8 a) Option A Claim Forms = 142,879

9 b) Option B Claim Forms = 199

10 12. Pursuant to paragraph 74 of the *Settlement Agreement*, individuals living in the same
11 household shall be deemed to be a single Class Member. Thus, after grouping valid claims based
12 on identical physical address, the total aggregate dollar value claimed, and which will be paid to
13 Settlement Class Members subject to Court approval, is \$1,332,386.25.

14 I declare under penalty of perjury under the laws of the United States and the State of
15 California that the foregoing is true and correct. Executed on this 12th day of December, 2019 at
16 Irvine, California.

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18 Ani S. Sarich

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