

MEDALLION MCKNIGHT INVESTMENT CLASS ACTION

NOTICE OF CERTIFICATION OF CLASS ACTION

PLEASE READ THIS NOTICE CAREFULLY AS IT MAY AFFECT YOUR LEGAL RIGHTS

1. WHAT IS THIS CLASS ACTION ABOUT

On February 9th, 2016, the Alberta Court of Queen's Bench certified *Richard Godderis et al v Certified Financial Savings & Mortgage Corp et al* (Action No. 1401-01033) as a class proceeding (the "**Class Action**").

If you are a Canadian resident, and you entered into a loan agreement with Certified Financial Savings & Mortgage Corp. ("**Certified**") and had your interests registered as the fourth mortgage on title to the property purchased through the Medallion McKnight project, you are a proposed class member.

2. PURPOSE OF THIS NOTICE

The purpose of this notice is to inform you of your rights in regard to a class action lawsuit commenced in Alberta alleging that the Defendants, Certified and Phillip Fiess (the "**Defendants**"), breached various duties.

The Class Action seeks for each investment pertaining to each sub-class, among other things:

- Damages representing the pro-rata amount that investors should have received upon the foreclosure of the Medallion McKnight Property had their interest been properly secured by the first mortgage on title (Instrument # 051 095 963).
- Special damages;
- Punitive and aggravated damages;
- Pre-judgment interest.

3. HOW DO I KNOW IF I AM A MEMBER OF THE CLASS?

You are a member of this class if:

1. You invested in the Medallion McKnight project by loaning funds to Certified Financial Savings & Mortgage Corp;
2. You had your interests registered as the fourth mortgage on title to the property purchased through the project;

3. You are not a defendant to this Class Action or related party (including a subsidiary, parent corporation, officer or director of one of the defendant companies, relative of an individual defendant, etc.)

4. WHO IS REPRESENTING MY INTEREST?

The court has appointed Richard Godderis as the Representative Plaintiff for the Class Action.

5. WHAT DOES THIS MEAN FOR ME?

AUTOMATIC INCLUSION: If you are a class member, and you wish to participate in the Class Action, then you do not need to do anything more at this stage. You are automatically included in the class.

ANY JUDGMENT OR SETTLEMENT WILL BE BINDING ON YOU: Each class member who does not opt-out of the Class Action will be bound by the terms of any judgment on the common issues or any settlement approved by the Court.

6. WHAT DO I DO IF I DO NOT WANT TO PARTICIPATE IN THE CLASS ACTION?

If you do not want to participate in the Class Action, then you must provide Class Counsel, by email, fax, or letter, a completed Opt-Out Form or a signed written request to opt-out of the class proceeding. Class Counsel's contact information is set out below.

The deadline for opting out is February 28, 2016. Investors who do not opt-out on or before this date will be deemed to be members of the class.

7. WHO DO I CONTACT IF I HAVE QUESTIONS?

The law firm of McGuigan Nelson LLP represents class members in all provinces. Class Members may contact Class Counsel via e-mail, ordinary mail, or fax:

McGuigan Nelson
205 – 625 11th Avenue SW
Calgary, Alberta T2R 0E1

E-mail: Medallion@mnllp.ca

Phone: 403.265.7744

Fax: 403.265.7528

Re: Medallion McKnight Class Action

Information about the Class Action is available online, at the following web address:

<http://www.mnllp.ca/current-cases/medallion-mcknight>