

TO: All persons who acquired a membership interest in Blackhawk Gold, LLC between January 1, 2010, through August 15, 2019.

YOU ARE HEREBY NOTIFIED that a proposed partial class action settlement has been preliminarily approved by the Court in *Shao et al. v. Muroff et al.*, Case No. 1:18-cv-00295-BLW (United States District Court, District of Idaho). The lawsuit challenges certain Defendants' handling of the Blackhawk Gold, LLC investors' funds that were invested in Blackhawk Gold, LLC. For further information regarding the partial settlement and your rights, please review the settlement documents enclosed with this Notice.

YOU ARE RECEIVING THIS NOTICE BECAUSE you are a person who purchased an interest in Blackhawk Gold, LLC, so you are a member of the proposed class. YOUR LEGAL RIGHTS WILL BE AFFECTED BY THE SETTLEMENT.

IF THE PARTIAL SETTLEMENT RECEIVES FINAL APPROVAL BY THE COURT:

- 1) You and all other class members will have the right to vote on a new Managing Member to manage the Blackhawk Gold, LLC assets.
- 2) You and all other class members will not receive monetary compensation.
- 3) You and all other class members will release Blackhawk Gold, LLC and its subsidiaries from all claims you may have related to your investment in Blackhawk Gold, LLC.

THE PARTIAL CLASS ACTION SETTLEMENT WILL NOT end the lawsuit against Defendants Serofim Muroff, Raymond Ku, Winner Xing, Equity Recap Account, LLC, Westlead Capital Inc. d/b/a Westlink or West Link, and Worldway Group. These Defendants will remain in this lawsuit and the action will continue against them.

IF YOU HAVE QUESTIONS REGARDING THE SETTLEMENT please contact Walter Bithell, Bithell Law Office PLLC (telephone: (208) 336-4440; email: walter@bithelllaw.com). Do not contact the Court.

CAREFULLY REVIEW THE ENCLOSED INFORMATION REGARDING IMPORTANT DEADLINES FOR YOU TO ASSERT YOUR LEGAL RIGHTS AND OPTIONS IN THE PARTIAL SETTLEMENT.