

CANADA

PROVINCE OF QUEBEC
DISTRICT OF HULL

No.: 550-06-000024-068

SUPERIOR COURT
(Class Action)

DAVID BROWN

Petitioner

v.

FRANÇOIS ROY
and
MARC JEMUS
and
ROBERT PRIMEAU
and
B2B TRUST
and
DESJARDINS FINANCIAL SECURITY
INVESTMENT INC. (OPTIFUND
INVESTMENT INC.)

Respondents

CANADA

PROVINCE OF QUÉBEC
DISTRICT OF HULL

No. : 550-06-000026-113

SUPERIOR COURT
(Class Action)

DAVID BROWN

Petitioner

v.

LLOYD'S UNDERWRITERS
and
SAMSON & ASSOCIÉS INC.

Respondents

**NOTICE TO MEMBERS OF THE CLASS ACTIONS
WITH REGARD TO THE FINANCIAL INVESTMENTS MADE WITH OR THROUGH
MARC JEMUS, FRANÇOIS ROY, ROBERT PRIMEAU
OR THEIR COMPANIES**

1. **TAKE NOTICE** that the bringing of two (2) Class Actions was authorized on August 19, 2010 and May 29, 2013 by judgments of the Honorable Justice Michel Déziel of the Superior Court for the benefit of the persons forming part of the group hereinafter described, namely:
 - 1.1. In the matter of David Brown v. François Roy, Marc Jémus, Robert Primeau, B2B Trust and Desjardins Financial Security Investment Inc. (Optifund Investment Inc.) of the Superior Court of the District of Hull bearing number 550-06-000024-068 (hereinafter "**Class Action number 1**"):

"All those natural persons, and legal persons with less than fifty (50) employees, who have made various investments proposed to them by Marc Jémus, François Roy and/or Robert Primeau, and/or through them, in and/or through companies related to one of them, in the year 2001 to 2005 inclusively".
 - 1.2. In the matter of David Brown v. Lloyd's Underwrites and Samson & Associés Inc. of the Superior Court of the District of Hull bearing number 550-06-000026-113 (hereinafter "**Class Action number 2**"):

"All those natural persons, and legal persons with less than fifty (50) employees, who have made various investments proposed to them by Marc Jémus, François Roy and/or Robert Primeau, and/or through them, in and/or through companies related to one of them, in the year 2001 to 2005 inclusively".
2. The Class Actions shall be hearing in the judicial district of Hull (to be confirmed);
3. The status of representative of the class members has been ascribed to Mr. David Brown.

THE COMMUN ISSUES

4. The principal questions to be dealt with collectively are as follow:
 - 4.1. Did Marc Jémus, François Roy and Robert Primeau act fraudulently with regard to the investments made at their inducement or through their companies by class members?
 - 4.2. Is each of the defendants liable for the financial losses sustained by class members and for the troubles and inconveniences they suffered?

CONCLUSIONS SOUGHT

5. The principal conclusion sought is as follows:

CONDEM the defendants jointly to compensate the class members for their financial losses and the troubles and inconveniences they suffered.

PARTICIPATION IN THE CLASS ACTION

- 6. Each member of the group who has not requested his or her exclusion will be bound by any judgment to be rendered in the class actions and/or by any settlement approved by the Court.
- 7. The class members cannot be called upon to pay the costs of the class actions if not successful.
- 8. Any class member can intervene to support the class actions.

EXCLUSION

9. A member may request his exclusion from the group by advising the clerk of the Superior Court of the district of Gatineau by registered or certified mail, on or before _____, **2013**, at the following address:

Clerk of the Superior Court, district of Hull
17, Laurier st.
Gatineau (Québec) J8X 4C1

Exclusion from Class Action number 1

Against:
Marc Jémus
François Roy
B2B Trust
Desjardins Financial Security Investments Inc.
(Optifund Investments Inc.)
File: 550-06-000024-068
Subject: David Brown

Exclusion from Class Action number 2

Against:
Samson and Associates Inc.
Lloyd's Underwriters
(for Iforum Financial Services Inc.)
File: 550-06-000026-113
Subject: David Brown

**LAWYERS FOR THE CLASS
MEMBERS**

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CLASS REPRESENTATIVE

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THIS NOTIVE IS PUBLISHED BY ORDER OF THE COURT