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Attorneys for Plaintiff Shannen Garner
Individually and on behalf of all others similarly situated.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

SHANNON GARNER, individually and on
behalf of all others similarly situated.

Plaintiff,

vs.

STRATEGIC SECURITY SERVICES, INC.;
and DOES 1-50, inclusive

Defendant.

Case No. CIVSB2412063 and CIVSB2420009

**DECLARATION OF NATHALIE
BELTRAN OF ILYM GROUP, INC., IN
SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: October 1, 2026
Time: 8:30 a.m.

Judge: Hon. Charlie Hill
Dept.: S-30

1 I, Nathalie Beltran, declare as follows:

2 1. I am a resident of the United States of America and am over the age of 18. I am a
3 Case Manager for ILYM Group, Inc., (herein after referred to as “ILYM Group”), the professional
4 settlement services provider who has been retained by the Parties’ Counsel and subsequently
5 appointed by the Court to serve as the Settlement Administrator for the above captioned *Garner v.*
6 *Strategic Security Services, Inc.* matter. I am authorized to make this declaration on behalf of
7 ILYM Group and myself. I have personal knowledge of the facts herein, and, if called upon to
8 testify, I could and would testify competently to such facts.

9 2. ILYM Group has extensive experience in administering Class Action Settlements,
10 including direct mail services, database management, claims processing and settlement fund
11 distribution services for Class Actions ranging in size from 26 to 4.5 million Settlement Class
12 Members.

13 3. ILYM Group was engaged by the Parties’ Counsel and subsequently approved and
14 appointed by the Court to provide notification services and settlement administration, pursuant to
15 the terms of the Settlement, in the above referenced Action. Duties performed to-date and to be
16 performed after Final Approval of the Settlement is granted, include: (a) printing and mailing the
17 *Notice of Proposed Settlement of Class and PAGA Action and Hearing Date for Final Court*
18 *Approval* (referred to as “Notice Packet”); (b) receiving and processing requests for exclusion; (c)
19 resolving Settlement Class Members’ disputes over the number of workweeks Defendant has
20 record of them working during the Class Period, which was pre-printed on their individualized
21 Notice Packet; (d) calculating individual settlement award amounts; (e) processing and mailing
22 settlement award checks; (f) handling tax withholdings as required by the Settlement and the law;
23 (g) preparing, issuing and filing tax returns and other applicable tax forms; (h) handling the
24 distribution of any unclaimed funds pursuant to the terms of the Settlement; and (i) performing
25 other tasks as the Parties mutually agree to and/or the Court orders ILYM Group to perform.

26 4. On June 3, 2026, ILYM Group received the Court approved text for the Notice
27 Packet from Counsel for Plaintiff. ILYM Group prepared a draft of the formatted Notice Packet,
28 which was approved by the Parties’ Counsel prior to mailing.

1 5. On July 10, 2026, ILYM Group received the class data file from Counsel for
2 Defendant, which contained the name, personnel number, social security number, last known
3 mailing address, last known telephone number and employment dates for each Settlement Class
4 Member. The data file was uploaded to our database and checked for duplicates and other possible
5 discrepancies. The Class Data contained 95 individuals with 5,009 Work Weeks during the Class
6 Period and 95 Aggrieved Employees with 2,540 Pay Periods during the PAGA period.

7 6. As part of the preparation for mailing, all 95 names and addresses contained in the
8 Class List were then processed against the National Change of Address (“NCOA”) database,
9 maintained by the United States Postal Service (“USPS”), for purposes of updating and confirming
10 the mailing addresses of the Settlement Class Members before mailing of the Notice Packet. The
11 NCOA contains requested change of addresses filed with the USPS. To the extent that an updated
12 address was found in the NCOA database, the updated address was used for the mailing of the
13 Notice Packet. To the extent that no updated address was found in the NCOA database, the original
14 address provided by Counsel for Defendants was used for the mailing of the Notice Packet.

15 7. On July 24, 2026, the Notice Packet was mailed, via U.S First Class Mail, to all 95
16 individuals contained in the Class List. Attached hereto, as **Exhibit A**, is a true and correct copy
17 of the mailed Notice Packet.

18 8. As of the date of this declaration, 16 Notice Packets have been returned to our office
19 as undeliverable. ILYM Group performed a computerized skip trace on the 16 returned Notice
20 Packets that did not have a forwarding address, in an effort to obtain an updated address for purpose
21 of re-mailing the Notice Packet. As a result of this skip trace, 15 updated addresses were obtained
22 and the Notice Packet was promptly re-mailed to those Settlement Class Members, via U.S First
23 Class Mail.

24 9. As of the date of this declaration, a total of 15 Notice Packets have been re-mailed.
25 Specifically, 15 have been re-mailed as a result of ILYM Group’s skip tracing efforts.

26 10. As of the date of this declaration, a total of 1 Notice Packet has been deemed
27 undeliverable. Specifically, 1 has been deemed undeliverable as no updated address was found
28 notwithstanding the skip tracing.

1 11. As of the date of this declaration, ILYM Group has not received any requests for
2 exclusion. The deadline to request exclusion from the Settlement is September 8, 2026.

3 12. As of the date of this declaration, ILYM Group has not received any objections to
4 the Settlement. The deadline to file an objection to the Settlement is September 8, 2026.

5 13. As of the date of this declaration, ILYM Group will report a total of 95 Participating
6 Claimants, representing 100% of the 95 Settlement Class Members.

7 14. Participating Claimants will receive a proportional share of the Net Settlement Fund
8 through individual settlement payments, based on the number of workweeks worked by Class
9 Members during the Class Period. The Net Settlement Fund is the amount remaining after
10 deduction of the Court-approved payments from the Gross Settlement Fund for Class Counsel Fees
11 and Litigation Costs, the Class Representative Enhancement Award, Settlement Administration
12 Fees to ILYM Group, LWDA and the Aggrieved Employees allocation, e.g.,

13	Gross Settlement Fund	\$ 150,000.00
14	Class Counsel Fees	\$ 50,000.00
15	Class Counsel Litigation Costs	\$ 20,000.00
16	Enhancement Award – Shannen Garner	\$ 6,500.00
17	Administration Fees	\$ 5,950.00
18	LWDA	\$ 7,500.00
19	Aggrieved Employees	\$ 2,500.00
20	Net Settlement Fund (estimated)	\$ 57,550.00

21 To determine a Participating Claimant's individual settlement award payment, the Net Settlement
22 Fund will be divided by the total number of workweeks worked by all Settlement Class Members
23 during the Class Period, multiplied by the number of workweeks worked by that Participating
24 Claimant. Based on these calculations, the Participating Claimants will receive an estimated
25 average gross payment of \$605.79, with the estimated highest gross payment being \$3,067.65, and
26 the estimated lowest gross payment being \$22.98.

27 15. Pursuant to the Agreement, 25% of the PAGA Allocated to Aggrieved Employees
28 (\$2,500.00) will be allocated regardless of whether he or she opts outs of the Class Settlement. To

determine an Aggrieved Employees' individual PAGA settlement award payment, the PAGA Allocated to Aggrieved Employees will be divided by the total number of pay periods worked by all Aggrieved Employees during the PAGA Period, multiplied by the number of pay periods worked by that Aggrieved Employee. Based on these calculations, the Aggrieved Employees will receive an estimated average gross payment of \$26.32, with the estimated highest gross payment being \$131.89, and the estimated lowest gross payment being \$0.98.

16. ILYM Group's total fees and costs for services in connection with the administration of this Settlement, which includes fees and costs incurred to-date, as well as anticipated fees and costs for completion of the settlement administration, are \$5,950.00. ILYM Group's work in connection with this matter will continue with the calculation of the settlement award payments, issuance and mailing of the settlement award checks, the necessary tax filing and reporting on such payments, and any other tasks that the Parties mutually agree to and/or the Court orders ILYM Group to perform.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct to the best of my knowledge and that this Declaration was executed this 8th day of September 2026, at Tustin, California.

Nathalie Beltran