

IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT
IN AND FOR ORANGE COUNTY, FLORIDA

TIMOTHY PHILLPOTTS, SUSAN
TAYLOR, BETHANN E. RITTER
SNYDER, ERIC HILLIS and KAREN
CONFER, each individually and as Class
Representatives,

Plaintiffs,

CASE NO.: 2017-CA-006570-O
CLASS REPRESENTATION

v.

GOLD CROWN RESORT MARKETING,
INC., a Florida corporation,

Defendant.

SUPPLEMENTAL DELCARATION OF COLLEEN G. ARRIGONI

I, COLLEEN G, ARRIGONI, declare, under penalty of perjury, that the following statements are true and correct:

1. I am over eighteen (18) years of age and I am authorized and competent to make the statements contained in this declaration, which statements are made based upon my personal knowledge.

2. I am the Chief Executive Officer of Gold Crown Resort Marketing, Inc. ("Gold Crown")

3. Due to the negative impacts of COVID-19, serious personal health issues and the instant class action lawsuit, Gold Crown was unable to remain in business and therefore has ceased operation and is closed.

4. After Gold Crown closed its business, it agreed to provide RSI Affinity, LLC dba RSI Vacations ("RSI") the contact information for former Gold Crown members in an effort to provide them an option to continue with another vacation travel company, if they chose to do so.

5. Gold Crown provided RSI access to the former Gold Crown website domain name at www.goldercrownresort.com, to allow RSI to redirect former Gold Crown members to RSI's website.

6. On April 19, 2021, I was made aware that a message posted by RSI on the former Gold Crown website, to redirect former Gold Crown members, either directly or indirectly incorrectly stated that RSI was Gold Crown's new travel agency and there would be a new name, Gold Crown Reserve. The statements made by RSI on the former Gold Crown website are incorrect and possibly misleading as Gold Crown is no longer in business and is not affiliated with a Gold Crown Reserve entity.

7. On April 19, 2021, I contacted RSI and requested that they remove the incorrect statements set forth in the message posted on Gold Crown's former website. Specifically, that verbiage be removed as Gold Crown is no longer in business, Gold Crown has not appointed RSI as Gold Crown's new travel agency nor is Gold Crown being renamed to Gold Crown Reserve.

8. Gold Crown has no knowledge of any entity named Gold Crown Reserve. Gold Crown in no way owns in whole or in part any entity named Gold Crown Reserve.

9. RSI is in no way owned in whole or in part by Gold Crown. The only business relationship between RSI and Gold Crown is that RSI was provided the contact information for former Gold Crown members in an effort to provide them an option to continue with another vacation travel company, if they chose to do so. In return for providing the contact information, RSI agreed to pay to Gold Crown a one-time payment equal to 30% of RSI's renewal fee for each former Gold Crown member that agreed to become a new member of RSI.

FURTHER DECLARANT SAYETH NAUGHT.

Executed this 21 day of April, 2021 at Winter Springs Florida.



COLLEEN G. ARRIGONI

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