

**IN THE CIRCUIT COURT OF THE FIFTH JUDICIAL CIRCUIT,
IN AND FOR MARION COUNTY, FLORIDA**

JANE DOE, on behalf of herself and
others similarly situated,
Plaintiff,

CASE NO.: 22 CA 1627
CLASS REPRESENTATION

vs.

CHARLES WILLIAM FIGEL,
Defendant.

PLAINTIFF'S MOTION TO APPROVE FORM AND MANNER OF CLASS NOTICE

Plaintiff, Jane Doe, on behalf of herself and all others similarly situated, by and through the undersigned counsel, respectfully requests that the Court enter an order granting approval of the form and manner of Class Notice in this case.

Proposed Notice Program

The Court granted Plaintiff's May 22, 2026 Motion for Class Certification. Plaintiff now seeks to send and publish notice to Class Members. Plaintiff proposes to implement a notice program that notifies Class Members via an advertisement campaign on the social media platform Facebook. The advertisement would appear as a post in Facebook users' feed in countries where Plaintiff has identified potential Class Members. If users click on the post, the advertisement will lead them to a Class-dedicated website that includes the "long form" notice.

Plaintiff further requests that the Court approve the content of the various notices being sent and published. Exhibit A is the "long form" notice. Exhibit B is the "short form" notice that will be posted as an advertisement on Facebook, targeting the geographic locations: The United States, Thailand, and Costa Rica where Defendant is believed to have committed the alleged acts of prolonged and systematic sexual abuse. The Facebook Advertisement will run for 30 days.

Class Counsel will also implement a dedicated Settlement Website at sexualabusevictimssettlement.com, which will contain relevant court documents, the claims form, long notice, and a means to contact Class Counsel. The Settlement Website will remain active through the pendency of this case.

Sufficiency of Proposed Notice Program

Due to the global nature of this case and the age demographic of potential class members, notice via social media (e.g. Facebook) advertisements is the most effective method of providing notice. Advertisement campaigns through social media have the potential to reach a massive global audience and are cost effective. For the countries that Plaintiff seeks to provide notice in (United States, Thailand, and Costa Rica), Facebook has the widest reach. The platform has nearly three billion monthly active users across the globe¹. In the United States, 71% of people said they use Facebook in 2025. Also in 2025, 68% of U.S. adults aged 18-29 used the platform, and 80% of U.S. adults aged 30-49 said they use it². In Thailand, 90.7% of internet users aged 16+ are on Facebook, with the largest engagement coming from those aged 25-44. On average, users spend 16 hours and 23 minutes per month on Facebook³. Costa Rica had 3.5 million (~70% of the population) Facebook users in late 2025. Facebook's advertisement reach in Costa Rica was equivalent to 67.8% of the total population at the end of 2025⁴. Facebook's ability to reach a wide global audience makes advertisements on the platform the most effective way to provide notice to class members. This plan, pursuant to Rule 1.220(d)(2), provides the “best notice practicable” to all potential Class Members. Accordingly, the Court should authorize the proposed notice plan.

¹ <https://tlhmarketing.co.uk/why-social-media-marketing-is-effective>

² <https://www.pewresearch.org/internet/fact-sheet/social-media/>

³ <https://www.meltwater.com/en/blog/social-media-statistics-thailand>

⁴ <https://datareportal.com/reports/digital-2026-costa-rica>

Plaintiff intends to implement the Notice Program as soon as possible and, therefore, respectfully request that the Court grant this motion without delay and authorize Plaintiff to send notice in substantial compliance with Exhibits A-B.

Proposed Notice Program Schedule

Dates/ Days (Days are calendar days unless otherwise specified)	Event
21 days after Order Granting Manner and Form of Notice	Notice Program Begins (“Notice Date”)
7 days after Notice Date	Class Counsel Shall file a declaration stating that the Notice Program was implemented
45 days after Notice Date	Deadline to Opt Out or Exclude from Class (“Opt-Out Deadline”)
7 days after Opt-Out Deadline	Deadline for Class Counsel to submit Opt-Out Report to the Court
60 days after Notice Date	Deadline for potential Class Members to submit claim to Class Counsel (“Claims Deadline”)

Respectfully submitted this 19th day of June 2026.

/s/ Paul S. Rothstein
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Fla. Bar No.: 310123
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Attorney for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY certify that on June 19, 2026, I electronically filed the foregoing PLAINTIFF'S MOTION TO APPROVE FORM AND MANNER OF CLASS NOTICE which will send a notice of electronic filing to all counsel of record in this action.

/s/ Paul S. Rothstein
Paul S. Rothstein

EXHIBIT A

LEGAL NOTICE

COURT-ORDERED NOTICE OF CERTIFIED CLASS ACTION LAWSUIT

This notice has been authorized by the [County] County Circuit Court.

This is not a solicitation from a lawyer.

PLEASE READ THIS NOTICE CAREFULLY. YOUR LEGAL RIGHTS ARE AFFECTED
WHETHER OR NOT YOU ACT.

SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT

If you experienced sexual abuse by Charles William Figel, then you may be part of a class action lawsuit against him. Please read this Notice carefully because it may affect your legal rights.

A court has ordered this notice.

- This Notice is regarding a class action lawsuit against an individual named Charles William Figel (“Figel”). The lawsuit alleges that Figel abused persons under eighteen years of age in the United States and elsewhere in the world. The alleged abuse includes sexual abuse and physical, mental, and psychological abuse.
- You are a member of the Class if you were 1) the victim of abuse (meaning abuse of a sexual nature and any physical, mental, or psychological abuse (directly or indirectly related to this matter)); and 2) the abuse was perpetrated by or with the participation of Charles William Figel.
 - Sexual abuse includes a variety of non-consensual sexual conduct ranging from sexual comments, stalking, staring at a naked child and fondling to any type of sexual act.

YOUR LEGAL RIGHTS AND OPTIONS IN THE SETTLEMENTS	
Ask to be Excluded by [DATE]	If you do not want to be included as a member of the class in this class action lawsuit, you must exclude yourself. This is called “opting out.” This is the only option that allows you to sue this Defendant for this same issue again.
Do nothing	By doing nothing, you may not have a chance for recovery.
Submit a Claim by [DATE]	If a settlement or verdict is later reached and approved, you may receive compensation.

BASIC INFORMATION

1. Why did I get this notice?

This Notice has been posted for the benefit of potential members of the Class. If you are uncertain about whether you are a member of the class, you may contact Class Counsel.

This Notice has been posted because members of the Class have the right to know about the ongoing class action lawsuit in which they are class members, and about all of their options as class members.

This Notice explains the lawsuits, your legal rights, what potential benefits are available, who is eligible for them, and how to get them.

The Court in charge of this lawsuit is the Circuit Court of the Fifth Judicial Circuit, In and For Marion County, Florida. The case before this court is known as *Jane Doe v. Charles William Figel*, (Case No. 22 CA 1627). The people who filed this lawsuit are called the Plaintiffs. The person being sued (Charles William Figel) is called the Defendant. This Notice is not an admission of liability by anyone, nor is it an expression of any opinion by the Court as to the merits of the claims or defenses asserted by any party to this litigation.

2. What is this lawsuit about?

This lawsuit claims that the Defendant, Charles William Figel, abused persons under eighteen years of age in the United States and elsewhere in the world. The alleged abuse includes sexual abuse and physical, mental, and psychological abuse. Figel allegedly engaged in a methodical pattern of sexual predation directed at minor children where he identified vulnerable child victims, engaged in grooming behaviors to normalize his exploitation, subjected them to sexual abuse, and in many instances documented that abuse through photography.

This lawsuit claims that Figel's actions constitute sexual battery and intentional infliction of emotional distress, and that those actions were grossly negligent.

According to the Complaint, Defendant used his position to gain access to minor children. Plaintiff alleges that Defendant:

- Engaged in repeated acts of sexual abuse and/or sexual battery of minors;
- Used positions of authority and trust to isolate victims and perpetrate abuse;
- Groomed minor victims and their families through manipulation, gifts, and false expressions of care;
- Made threats and used psychological manipulation to prevent disclosure;
- Continued the pattern of abuse over a period of years.

This is a civil lawsuit only. The civil claims in this case are separate from and independent of any criminal proceedings. A civil lawsuit may proceed regardless of the outcome of any criminal case.

Plaintiff seeks compensatory damages for physical and psychological injuries, pain and suffering, medical and therapeutic expenses, lost earnings and earning capacity, and all other appropriate relief. Plaintiff may also seek punitive damages based on Defendant's alleged intentional misconduct.

3. Why is this case a class action?

In a class action, one or more people called Class Representatives sue on behalf of other people who have similar claims. The people together are a “Class” or “Class Members.” One court resolves the issues for everyone in the Class – except for those who choose to exclude themselves from the Class.

Here, the Court decided the lawsuit can be a class action because it meets the requirements of Florida Rule of Civil Procedure 1.220, which governs class actions in the state of Florida. Specifically, the Court found that: (1) there are numerous people who fit the class definition; (2) there are legal questions and facts that are common to each of them; (3) the Plaintiff’s claims are typical of the claims of the rest of the Class; (4) Plaintiff, and the lawyers representing the Class, will fairly and adequately represent the Class Members’ interests; (5) the common legal questions and facts are more important than questions that affect only individuals; and (6) this class action will be more efficient than having individual lawsuits.

4. Who is a member of the Class?

You are part of the Class if you: (1) reside in the United States or elsewhere in the world; (2) within the applicable statute of limitations of filing of this action, were the victim of Abuse (i.e., abuse of a sexual nature and any physical, mental, or psychological abuse directly or indirectly arising as a result) by, or with the participation of, Charles William Figel; and (3) were subject to this abuse or the consequences resulting thereof while under seventeen (17) years of age.

Sexual abuse encompasses a variety of non-consensual sexual conduct ranging from sexual comments, stalking, staring at nude children, and fondling to the extent of any type of sexual act.

If you are uncertain as to whether you are a member of the Class, you may contact Class Counsel.

5. Who is NOT a Member of the Class?

Individuals excluded from the Class are as follows: (1) the Defendant, Charles William Figel; (2) the judge assigned to this case and any member of the judge’s immediate family; (3) all persons who properly execute and timely file a Request for Exclusion; (4) all persons who have given valid releases releasing the Defendant from the claims asserted herein; (5) all persons who have obtained judgement against Defendant Charles William Figel on the claims here presented on or before the date of filing this action; (6) all persons and entities who timely opt out of this suit; and (7) all persons who, prior to the date of filing this action, have filed a non-class action claim against the Defendant for claims asserted herein.

YOUR OPTIONS AND RIGHTS

6. How do I submit a claim?

To submit a claim, you must first complete and submit a form with information pertaining to the Abuse perpetrated by, or with the participation of, Charles William Figel to Class Counsel. Class Counsel will be responsible for collecting all claim forms and information of the Abuse to determine whether a claim is eligible to be approved. Class Counsel will present claims to the Court, through use of pseudonyms, in consideration for a final determination of liability and damages at Trial. Your claim may not be accepted or presented if it is not: (a) submitted in a timely manner and in accordance with the directions on the claim form and the details of this suit; (b) fully and truthfully completed by a Class member or their representative with all of the information requested in the claim form; and (c) signed by the Class member. Claims that cannot be confirmed by Class Counsel may be subject to challenge, nonpayment, or a reduced share of available funds.

You can submit a claim form by clicking this [www.sexualabusevictimssettlement.com], or by printing the claim form from the website and returning it to Class Counsel via mail or email before [**Claim Deadline**].

Jane Doe v. Charles William Figel, (Case No. 22 CA 1627)

Paul S. Rothstein, PA

626 NE 1st Street, Gainesville, FL 32601

Email: claims@sexualabusevictimssettlement.com

7. What happens if I do nothing?

If you do nothing, you will remain a member of the Class but may not receive money if the case recovers in a verdict or settlement. This means:

- You will be bound by all decisions the Court makes in this case, including any final judgment or settlement;
- If Plaintiff wins at trial, you may not be entitled to share in any damages awarded;
- If Plaintiff loses at trial, you will not be able to bring your own separate lawsuit against Defendant on these same claims;
- You will give up ("release") your right to sue Defendant separately in any other civil proceeding based on the same facts and claims alleged in this lawsuit.

To potentially recover from this case, you will need to submit a claim before the CLAIMS DEADLINE [**DATE**]. This Notice may be the only attempt to notify you of your right to recover in this case.

8. How do I exclude myself?

You have the right to exclude yourself from the Class. Excluding yourself is sometimes called "opting out." If you exclude yourself:

- You will not be bound by the Court's decisions in this lawsuit;
- You will not receive any recovery if there is a settlement or if Plaintiffs win at trial;
- You will preserve your right to file your own individual lawsuit against Defendant for the same claims;
- You will be responsible for pursuing your own case, including hiring your own attorney and paying any associated costs.

IMPORTANT: If you wish to exclude yourself from the Class, you must act by [EXCLUSION DEADLINE].

How to Request Exclusion

To exclude yourself from the Class, you must submit a written request for exclusion that includes:

- Your full legal name;
- Your current mailing address and telephone number;
- A statement that you wish to be excluded from the Class in *Jane Doe v. Charles William Figel*, (Case No. 22 CA 1627);
- Your signature;
- The date of the request.

Your exclusion request must be mailed to Class Counsel and postmarked no later than [EXCLUSION DEADLINE]:

Jane Doe v. Charles William Figel, (Case No. 22 CA 1627)
Paul S. Rothstein, PA
626 NE 1st Street, Gainesville, FL 32601

Exclusion requests submitted by email or fax, or that are missing required information, may not be accepted. If you are uncertain whether your exclusion request was received, contact Class Counsel.

If you exclude yourself, you may wish to consult with your own attorney to understand your individual legal options. Please note that Florida statutes of limitations and repose may affect your ability to bring independent claims. Consult an attorney promptly.

9. Is this case set for trial?

This case is set for trial on XXX, 2026.

PROCEEDING ANONYMOUSLY

10. Can I participate in this lawsuit anonymously?

The Court is aware that Class Members are survivors of alleged sexual abuse and has taken, and may take further steps to protect the privacy of Class Members throughout these proceedings. The following protections are in place or may be requested:

- Plaintiffs and other Class Members may proceed in this litigation under pseudonyms (e.g., "Jane Doe" or "John Doe") rather than their legal names in public filings, subject to Court approval.
- Protective orders may be entered to limit the disclosure of personally identifying information of Class Members in discovery and in public filings.
- Information you provide to Class Counsel is protected by the attorney-client privilege and will not be shared with Defendant or the public without your consent or Court order.
- If you submit a claim form or contact Class Counsel, your personal information will be used only to administer the litigation and will be kept confidential to the fullest extent permitted by law.

If you have specific concerns about your privacy in connection with this lawsuit, please contact Class Counsel. You may also seek your own legal counsel for guidance on protecting your identity.

NOTE: Florida's Child Abuse Reporting Laws (Fla. Stat. § 39.201 et seq.) impose mandatory reporting obligations on certain categories of persons. These obligations are separate from and not affected by this civil lawsuit. If you have information about ongoing or suspected child abuse, you are encouraged to contact the Florida Abuse Hotline at 1-800-962-2873.

THE LAWYERS REPRESENTING YOU

11. Do I have a lawyer in this case?

The Court decided that the Paul S. Rothstein and Kyla V. Lemieux are qualified to represent you and all other Class Members. These lawyers are called "Class Counsel." You will not be charged for these lawyers. They are experienced in handling similar cases against other entities. More information about the law firm, their practices, and their lawyers' experience is available at: <https://www.rothsteinforjustice.com/>. You may also contact the firm by emailing claims@sexualabusevictimssettlement.com.

Class Counsel represents the interests of the Class. You may hire your own attorney to advise you, but if you hire your own attorney, you will be responsible for paying that attorney's fees.

12. How will the lawyers be paid?

Class Counsel are currently working on this case on a contingency basis, meaning they are not paid unless there is a recovery for the Class. At the conclusion of the case, Class Counsel will apply to the Court for an award of attorneys' fees and costs from any recovery obtained. Any such award is subject to Court approval. You will be given notice and an opportunity to object to any fee request.

GETTING MORE INFORMATION

13. Are there more details available?

This Notice is only a summary. For a more detailed statement of the matter involved in this lawsuit, you may contact Class Counsel at claims@sexualabusevictimssettlement.com.

All filings in this case are part of the public record and are available through the Clerk of Court for Marion County, Florida. You may also review documents on the case website at www.sexualabusevictimssettlement.com.

ADDITIONAL RESOURCES FOR SURVIVORS

The Court and the parties recognize that receiving this Notice may be difficult. If you or someone you know needs support, the following national and Florida-based resources are available:

- RAINN National Sexual Assault Hotline: 1-800-656-HOPE (4673) | www.rainn.org
- Crisis Text Line: Text HOME to 741741
- Florida Council Against Sexual Violence: 1-888-956-7273 | www.fcasv.org
- National Child Abuse Hotline (Childhelp): 1-800-422-4453
- Florida Abuse Hotline (DCF): 1-800-962-2873
- Victim Connect Resource Center: 1-855-4-VICTIM (1-855-484-2846)

These resources are confidential. Contacting them does not affect your rights in this lawsuit in any way.

BY ORDER OF THE COURT

Honorable Lisa Herndon

Circuit Court Judge, Fifth Circuit, Marion County, Florida

Dated: [DATE OF ORDER]

DO NOT CALL OR WRITE TO THE COURT OR DEFENDANT'S ATTORNEYS WITH QUESTIONS.

Direct all inquiries to Class Counsel using the contact information above.

EXHIBIT B

A COURT HAS ORDERED THIS NOTICE

**WERE YOU A VICTIM OF
SEXUAL ABUSE?**

Jane Doe v. Charles William Figel

Case No.: 22 CA 1627, Fifth Judicial Circuit, Marion County, Florida

