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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

SHELA CAMENISCH, et al.

Plaintiffs,

v.

UMPQUA BANK,

Defendant.

Case No. 5:20-cv-5905-PCP

DECLARATION OF BRIAN BETTS

1 I, BRIAN BETTS, declare as follows:

2 1. I am President and Chief Financial Officer of Operation HOPE. Operation HOPE is a
3 nonprofit 501(c)(3) organization. Operation HOPE's mission is to improve the financial lives of
4 millions. Operation HOPE believes that economic inequality, financial illiteracy, social injustice,
5 inequitable access to capital and lack of financial dignity are real and systemic issues that have
6 hindered the economic growth and opportunity for underserved individuals and small businesses for
7 over 400 years in America. Operation HOPE recognizes these problems are systemic and complex and
8 require innovative and collaborative solutions from a variety of partners in government, community,
9 and the private sector. Operation HOPE partners with like-minded players to identify where the greatest
10 impact can be achieved. HOPE offers tangible programs and initiatives that address these problems,
11 establishes audacious long-term goals for improvement, creates and tracks key performance indicators
12 to measure their progress, and then takes the lead in raising awareness, lobbying for change, rallying
13 support and building coalitions to work towards eliminating these issues.

14 2. I make this declaration in support of a motion for *cy pres* distribution in connection with
15 the *Camenisch* litigation. It is my understanding that the plaintiffs in the *Camenisch* litigation made
16 claims against Umpqua Bank, alleging the bank aided and abetted PFI's fraudulent scheme.

17 3. Among other initiatives, Operation HOPE supports programs relating to credit and
18 money management, homeownership, small business development, financial disaster recovery,
19 employee financial wellness, client grant opportunities and youth programs.

20 4. Of particular relevance, one of Operation HOPE's lead initiatives is Financial Literacy
21 for All. The goal of this initiative is to spur a national movement of equalizing the playing field for all
22 people to learn foundational money management principles. The initiative aims to make learning
23 money management practices easier to understand and generate public awareness of its importance by
24 directly connecting with working adults. This program is designed to educate people on what they need
25 to know, coach them through putting what they learn into practice and connect them to the resources
26 they need to improve their own financial future and that of their local community.

27 5. Another one of Operation HOPE's initiatives is promotion of the Investors' Bill of
28 Rights, which is Operation HOPE's vision to provide a clear path for financial institutions, asset

managers and their trusted advisors to incorporate education on financial wellness and transparency in their offerings to retail investors. As part of this initiative, Operation HOPE is calling on both the financial services industry and regulators to embrace reforms so that the stock market (and other financial investments) remains a safe and secure market for capital and wealth formation accessible for all. Among other requirements, this initiative requires that financial institutions provide: comprehensive investor education programming and investment coaching at no cost to the consumer, financial literacy and investment fundamentals resources for all individual account holders by accredited third-party investment education coaching/seminars through its communications channels, enhanced transparency, including disclosure of the true costs of transactions, and a reward system for consumers who increase their financial literacy and investment fundamentals knowledge base, including discounted costs and other monetary incentives. Operation HOPE has recently partnered with Nasdaq Foundation to educate individuals on the basics of investing, including warning signs of potential scams and/or Ponzi schemes.

6. Additional information about Operation HOPE is available at www.operationhope.org.

7. A cy pres award to Operation HOPE will enable the organization to continue to promote financial literacy, and I anticipate that the funds will be used to support our financial coaching model in programs like credit and money management, homeownership, small business assistance and investing basics.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 2nd day of October 2026, in Atlanta, Georgia.



Brian Betts