

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA

**IF YOU PURCHASED OR ACQUIRED CHINA INTEGRATED ENERGY, INC. STOCK FROM MARCH 31, 2010 TO APRIL 21, 2011, YOU COULD RECIEVE A PAYMENT FROM A CLASS ACTION SETTLEMENT.**

*A federal court authorized this Notice. This is not a solicitation from a lawyer.  
Your legal rights are affected whether or not you act. Please read this Notice carefully.*

SUMMARY OF KEY PROVISIONS AND REASONS FOR SETTLEMENT

- This Notice advises you of a proposed settlement consisting of \$2.1 million in cash to resolve the class action lawsuit against Defendants China Integrated Energy, Inc. (“China Integrated” or the “Company”), Xincheng Gao, Gaihong Li, Junrong Guo, Albert C. Pu, Larry Goldman, and Christopher Wenbing Wang (collectively, “Defendants”). This Settlement is a final resolution of the claims brought on behalf of the Class against China Integrated and the other related defendants. This action was certified by the Court on February 17, 2015, to proceed as a class action on behalf of the Class of certain purchaser and acquirors of China Integrated common stock.
- This settlement is separate from the previously announced partial settlement of this action with Defendant Sherb & Co. LLP (“Sherb”), the outside auditor of China Integrated during the relevant period. **If you already have submitted a claim form in connection with the Sherb settlement, you do not need to file another Proof of Claim Form. Instead, you must complete and submit the Release Form (included with this Notice, or available at the website below).**
- **Security and Time Period:** China Integrated Energy, Inc. (stock symbol: CBEH) securities purchased or acquired from March 31, 2010 to April 21, 2011, inclusive (“Settlement Class Period”).
- **Settlement Fund:** \$2.1 million in cash, plus any interest earned. Your recovery will depend on the number of shares of China Integrated stock purchased during the Settlement Class Period, and the timing of your purchases and any sales. It will also depend on the number of valid claim forms that members of the Class submit and the amount of such claims. Based on the information currently available to Plaintiffs and the analysis performed by their damages consultants, it is estimated that if Class Members submit claims for 100% of the shares eligible for distribution under the Plan of Allocation (described below), the estimated average distribution per share of common stock will be approximately \$0.08 per share before deduction of Court-approved fees and expenses, including the cost of notifying Members of the Settlement Class and settlement administration and any attorneys’ expenses awarded by the Court to counsel for the Plaintiffs. Historically, actual claims rates are less than 100%, which result in higher distributions per share. A Settlement Class Member’s actual recovery will be a *pro rata* share of the Net Settlement Fund determined by that claimant’s recognized claim as compared to the total recognized claims of all Settlement Class Members who submit valid Proof of Claim and Release forms (“Proofs of Claim”).
- **Reasons for Settlement:** This case has been litigated since March 2011. The Settlement provides the Settlement Class with a benefit now, in lieu of engaging in years of further litigation – including summary judgment motions, a contested trial and likely appeals – with the risk of no recovery at all, after years of continued litigation.
- **If the Case Had Not Settled:** The Settlement must be compared to the risk of no recovery after contested motions, trial and likely appeals. A trial is a risky proposition, and Plaintiffs would not necessarily have prevailed. The claims in this case involve numerous complex legal and factual issues, many of which would require expert testimony. Among the many key issues about which the two sides do not agree are: (1) whether Defendants violated the securities laws or otherwise engaged in any wrongdoing; (2) whether the facts alleged by Plaintiffs were material, false, misleading or otherwise actionable under the securities laws; (3) whether the various facts alleged by Plaintiffs influenced the trading prices of China Integrated stock during the relevant period; (4) the method for determining whether the price of China Integrated stock was artificially inflated during the relevant period; (5) the amount (if any) of such inflation; and (6) the amount of damages (if any) that could be recovered at trial.

**QUESTIONS? Call 1-877-300-3441 toll free, or visit [www.ChinaIntegratedSettlement.com](http://www.ChinaIntegratedSettlement.com)**

- **Attorneys’ Fees and Expenses:** The Court-appointed Lead Counsel have not yet received any payment for their work incurred in investigating the facts, conducting this litigation and negotiating the Settlement on behalf of the Plaintiffs and the Class. The Court has only reimbursed Lead Counsel in the amount of \$100,000 for incurred and paid legal expenses from the Sherb settlement. Lead Counsel intends to apply for an award of attorneys’ fees not to exceed 25% of the total settlement funds, and reimbursement of additional expenses in the amount not to exceed \$375,000. The request for litigation expenses may include a request for reimbursement of the costs and expenses of Plaintiffs in accordance with 15 U.S.C. § 78u-4(a)(4) and incentive award up to \$10,000 each for representing the Settlement Class. If the above amount is requested and approved by the Court, the estimated average cost per eligible share of common stock will be approximately \$.03 per share, if claims are submitted for 100% of the eligible shares of China Integrated common stock.
- **Dismissal and Releases:** If the proposed Settlement is approved, the Court will enter a Judgment and Order of Dismissal with Prejudice as to Defendant Sherb (the “Judgment”). The Judgment will dismiss the Released Claims (as defined in the Stipulation of Settlement) with prejudice as to the Released Persons, which include Sherb and its Related Parties. The Judgment will provide that all Class Members shall be deemed to have released and forever discharged all Released Claims against Defendants.

<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT</b>	
Submit a Claim Form	The only way to get a payment.
Exclude Yourself	Get no payment. This is the only option that allows you to participate in another lawsuit against the Defendants relating to the class claims being released in this case.
Object	Write to the Court about why you don’t like the Settlement.
Go to a Hearing	Ask to speak in Court about the fairness of the Settlement.
Do Nothing	Get no payment. Give up rights.

- These rights and options – and the deadlines to exercise them – are explained in this Notice.
- The Court presiding over this case must decide whether to approve the Settlement. Payments will be made only if the Court approves the Settlement and the time for any appeals has lapsed, or, if there are any appeals, after the appeals are resolved. Please be patient.

## WHAT THIS NOTICE CONTAINS

**BASIC INFORMATION** .....PAGE 3

1. Why did I get this notice package?
2. What is this lawsuit about?
3. Why is this a class action?
4. Why is there a Settlement?

**WHO IS IN THE SETTLEMENT** .....PAGE 4

5. How do I know if I am part of the Settlement?
6. Are there exceptions to being included?
7. I’m still not sure if I am included.

**THE SETTLEMENT BENEFITS—WHAT YOU GET**..... PAGE 4

8. What does the Settlement provide?
9. How much will my payment be? Understanding your payment.

**HOW YOU GET A PAYMENT—SUBMITTING A CLAIM FORM** .....PAGE 6

10. How can I get a payment?	
11. When would I get my payment?	
12. What am I giving up to get a payment or stay in the Class?	
<b>EXCLUDING YOURSELF FROM THE SETTLEMENT</b>	<b>PAGE 7</b>
13. How do I get out of the Settlement?	
14. If I don't exclude myself, can I sue Defendants for the same thing later?	
15. If I exclude myself, can I get money from this Settlement?	
<b>THE LAWYERS REPRESENTING YOU</b>	<b>PAGE 8</b>
16. Do I have a lawyer in the case?	
17. How will the lawyers be paid?	
<b>OBJECTING TO THE SETTLEMENT</b>	<b>PAGE 8</b>
18. How do I tell the Court that I don't like the Settlement?	
19. What's the difference between objecting and excluding?	
<b>THE COURT'S FAIRNESS HEARING</b>	<b>PAGE 9</b>
20. When and where will the Court decide whether to approve the Settlement?	
21. Do I have to come to the hearing?	
22. May I speak at the hearing?	
<b>IF YOU DO NOTHING</b>	<b>PAGE 9</b>
23. What happens if I do nothing at all?	
<b>GETTING MORE INFORMATION</b>	<b>PAGE 10</b>
24. Are there more details about the Settlement?	
25. How do I get more information?	

## **BASIC INFORMATION**

### **1. Why did I get this notice package?**

You or someone in your family may have purchased or acquired China Integrated stock from March 31, 2010 to April 21, 2011, inclusive.

This Notice was sent because you have a right to know about a proposed Settlement of a class action lawsuit, and about all of your options, before the Court decides whether to approve the Settlement. If the Court approves the Settlement and after any objections or appeals are resolved, the Claims Administrator appointed by the Court will make the payments that the Settlement allows.

This package explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

The Court in charge of the case is the United States District Court for the Central District of California, and the case is known as *Brown v. China Integrated Energy, Inc., et al*, Case No. 11-cv-02559-BRO-PLA. The entity that leads the Action is Puerto Rico Teachers Retirement System, the Court-appointed "Lead Plaintiff," and the companies and individuals it sued are called Defendants.

### **2. What is this lawsuit about?**

This case alleges that Defendants violated the Federal Securities Laws by making false and misleading statements about China Integrated's business and financial results. Lead Plaintiff alleges that Defendants improperly overstated China Integrated's revenues and financial condition in its financial statements filed with the U.S Securities and Exchange Commission ("SEC"). Lead Plaintiff asserts that as a result of allegedly improper activities concerning the Company's financial reporting, the market price of China Integrated's stock was artificially and improperly inflated, and that

Settlement Class Members overpaid for China Integrated stock purchased during the Settlement Class Period. Defendants have denied and continue to deny all of the allegations and that they did anything wrong.

### **3. Why is this a class action?**

Class actions are generally used in lawsuits that affect a large number of individuals; in effect, the class action operates to consolidate into a single action all of the claims of individuals allegedly harmed by the same conduct or course of conduct, thus alleviating the need for Members of the Class to file their own individual lawsuits to recover for the harm alleged. Judge Beverly Reid O'Connell is the judge for this class action.

### **4. Why is there a settlement?**

The Court did not decide in favor of the Plaintiffs or Defendants. Instead, both sides agreed to a Settlement. This permits them to avoid the cost and uncertainty of a trial and permits eligible Class Members who submit valid claims to receive compensation. Plaintiffs and their attorneys think the Settlement is best for all Settlement Class Members.

## **WHO IS IN THE SETTLEMENT**

To see if you will receive money from this Settlement, you first have to determine if you are a Settlement Class Member.

### **5. How do I know if I am part of the Settlement?**

The Settlement Class includes all persons and entities who purchased or otherwise acquired the common stock of China Integrated between March 31, 2010 through April 21, 2011, including persons or entities that purchased common stock pursuant and/or traceable to the Company's Registration Statement, effective May 19, 2010, and the Prospectuses issued in connection with the Company's Secondary Offerings on or about December 28, 2010 through January 7, 2011, and who were damaged thereby.

### **6. Are there exceptions to being included?**

You are not a Settlement Class Member if you are a Defendant, including as applicable, Defendants' family members, legal representatives, heirs, executors, successors, assigns, attorneys, current and former officer or directors of China Integrated, Sherb, or any such subsidiaries of Sherb or China Integrated.

You are also not a Settlement Class Member if you submit valid and timely request for exclusion from the Settlement Class pursuant to this Notice.

### **7. I'm still not sure if I am included?**

If you are still not sure whether you are included, you can ask for free help. For more information, you can contact the Claims Administrator, Angeion Group, by email to [ChinaIntegrated@AngeionGroup.com](mailto:ChinaIntegrated@AngeionGroup.com), or telephone at 1-877-300-3441, or visit the web site at [www.ChinaIntegratedSettlement.com](http://www.ChinaIntegratedSettlement.com). Filling out the claim form described in question 10 also will tell you whether you qualify.

## **THE SETTLEMENT BENEFITS — WHAT YOU GET**

### **8. What does the Settlement provide?**

The Settlement will result in a fund of \$2.1 million in cash, plus any interest earned (the "Settlement Fund"). This amount is in addition to the \$400,000 secured from Sherb. The Settlement Fund, plus interest earned from the date it is established, less costs, fees, and expenses (the "Net Settlement Fund"), will be divided among all eligible Settlement Class

**QUESTIONS? Call 1-877-300-3441 toll free, or visit [www.ChinaIntegratedSettlement.com](http://www.ChinaIntegratedSettlement.com)**

Members who send in valid Proofs of Claim (“Authorized Claimants”). Costs, fees, and expenses include Court-approved attorneys’ fees and expenses, the costs of notifying Settlement Class Members, including the costs of printing and mailing this Notice; the cost of publishing newspaper notice; the costs of claims administration; and taxes on the Settlement Fund.

## **9. How much will my payment be? Understanding your payment.**

Your share of the Net Settlement Fund, if any, will depend on the number of valid claim forms that Class Members send in and the number of shares of China Integrated stock you purchased during the relevant period and when you bought and sold them. As discussed above in answer to Question 2, Plaintiffs contend that during the Settlement Class Period Defendants misrepresented certain important facts about China Integrated’s financial condition and operations. Plaintiffs assert that, as a result, the price of China Integrated stock was “artificially inflated” during the Settlement Class Period and Settlement Class Members paid more for China Integrated stock than they would have if the truth was known. The Plan of Allocation described below is based on this damage theory as well as U.S. Supreme Court decisions that limit recovery for certain purchases and sales during the Settlement Class Period.

For purposes of developing the Plan of Allocation, Plaintiffs’ consultant calculated the amount of artificial inflation in the daily closing market prices for China Integrated stock for each day of the Settlement Class Period. *See* Table A, below. In computing the artificial inflation, Plaintiffs’ consultant considered price changes of China Integrated stock in reaction to certain public announcements regarding China Integrated, and adjusted the price changes in China Integrated stock for changes that were attributable to market forces unrelated to the alleged fraud.

**Table A**

Artificial Inflation

<u>Purchase or Sale Date Range</u>	<u>Per Share</u>
03/31/2010 – 03/15/2011	\$4.76
03/16/2011 – 03/16/2011	\$3.90
03/17/2011 – 03/22/2011	\$2.66
03/23/2011 – 03/25/2011	\$2.23
03/28/2011 – 04/20/2011	\$1.16

For shares of common stock purchased or otherwise acquired between March 31, 2010 and April 20, 2011:

- A. For shares held at the end of trading on September 12, 2011, the Recognized Loss shall be that number of shares multiplied by the lesser of:
- (1) the applicable purchase date artificial inflation per share figure, as found in Table A; or
  - (2) the difference between the purchase price per share and \$0.800.<sup>1</sup>
- B. For shares sold between March 31, 2010 and April 20, 2011, the Recognized Loss shall be that number of shares multiplied by the lesser of:
- (1) the applicable purchase date artificial inflation per share figure less the applicable sales date artificial inflation per share figure, as found in Table A; or
  - (2) the difference between the purchase price per share and the sales price per share.
- C. For shares sold between April 21, 2011 and September 12, 2011, the Recognized Loss shall be the lesser of:
- (1) the applicable purchase date artificial inflation per share figure, as found in Table A; or

---

<sup>1</sup> Pursuant to Section 21(D)(e)(1) of the Private Securities Litigation Reform Act of 1995, “in any private action arising under this title in which the plaintiff seeks to establish damages by reference to the market price of a security, the award of damages to the plaintiff shall not exceed the difference between the purchase or sale price paid or received, as appropriate, by the plaintiff for the subject security and the mean trading price of that security during the 90-day period beginning on the date on which the information correcting the misstatement or omission that is the basis for the action is disseminated.” The mean closing price of China Integrated common stock during the 90-day period beginning on June 15, 2011 and ending on September 12, 2011 was \$0.800. Trading in China Integrated common stock was suspended between April 21, 2011 and June 14, 2011.

- (2) the difference between the purchase price per share and the average closing price between April 21, 2011 and the date of sale.<sup>2</sup>

D. For those shares purchased pursuant or traceable to the Secondary Offerings on or about December 28, 2010 and January 7, 2011, the Recognized Loss shall be the greater of that as provided under A., B. or C. above, or the difference between the amount paid for the security (not exceeding \$7.00, the price at which the security was offered to the public and:

- (1) \$3.76, the value of the shares as of filing of the first case in this Action on March 25, 2011; or
- (2) the price at which the shares were sold prior to March 25, 2011; or
- (3) the price at which the shares were sold after March 25, 2011, but prior to October 1, 2014 (the date of this Settlement), if such amount shall be less than that provided under D. (1).

Your recovery will depend on your “Recognized Loss,” which is a calculation to arrive at a loss figure for purposes of calculating each claimant’s *pro rata* participation in the Settlement Fund. The date of purchase or sale is the “contract” or “trade” date as distinguished from the “settlement” date. The purchase and sales prices exclude any brokerage commissions, transfer taxes or other fees. For Settlement Class Members who made multiple purchases or sales during the Settlement Class Period, the first-in, first-out (“FIFO”) method will be applied to such holdings, purchases, and sales for purposes of calculating a claim. Under the FIFO method, sales of common stock during the Settlement Class Period will be matched, in chronological order, against common stock purchased during the Settlement Class Period.

A Settlement Class Member will be eligible to receive a distribution from the Net Settlement Fund only if a Settlement Class Member had a net loss. All gains and losses (as calculated under the above plan) will be combined and thereafter netted against each other. The Court has reserved jurisdiction to allow, disallow or adjust the claim of any Settlement Class Member on equitable grounds. Payment pursuant to the Plan of Allocation set forth above shall be conclusive against all Authorized Claimants. No Person shall have any claim against Plaintiffs, any Plaintiffs’ counsel, the Claims Administrator or other Person designated by Plaintiffs’ counsel, or against Defendants, the Related Parties and/or the Released Persons based on distributions made pursuant to the Stipulation and the Settlement contained therein, the Plan of Allocation, or further orders of the Court. All Settlement Class Members who fail to complete and file a valid and timely Proof of Claim shall be barred from participating in distributions from the Net Settlement Fund (unless otherwise ordered by the Court), but otherwise shall be bound by all of the terms of the Stipulation, including the terms of any order and/or judgment entered and the releases given. In addition, no distribution will be made unless the amount of the check is at least \$1.50.

## **HOW YOU GET A PAYMENT – SUBMITTING A CLAIM FORM**

### **10. How can I get a payment?**

**If you already have submitted a claim form in connection with the previously announced Sherb settlement, you do not need to submit another Proof of Claim form. Instead, you must complete and submit the Release Form.**

However, if you have not submitted a claim form, in order to qualify for payment, subject to the Plan of Allocation, you must be an eligible Settlement Class Member and send in a valid Claim Form, and properly document your claim as requested in the Claim Form. A Claim Form is enclosed with this Notice. Read the instructions carefully, fill out the Claim Form, include the documents the form asks for, sign it, and mail (post-marked) no later than **June 1, 2016**.

---

<sup>2</sup> Pursuant to Section 21(D)(e)(2) of the Private Securities Litigation Reform Act of 1995, “in any private action arising under this title in which the plaintiff seeks to establish damages by reference to the market price of a security, if the plaintiff sells or repurchases the subject security prior to the expiration of the 90-day period described in paragraph (1), the plaintiff’s damages shall not exceed the difference between the purchase or sale price paid or received, as appropriate, by the plaintiff for the security and the mean trading price of the security during the period beginning immediately after dissemination of information correcting the misstatement or omission and ending on the date on which the plaintiff sells or repurchases the security.”

## **11. When would I get my payment?**

The Court will hold a Fairness Hearing on **July 11, 2016**, at 1:30 p.m., to decide whether to approve the Settlement. If the Court approves the Settlement, there may be appeals. It is always uncertain when appeals will be resolved, and resolving them can take time, perhaps several years. Everyone who sends in a Claim Form will be informed of the determination with respect to their claim. Please be patient.

## **12. What am I giving up to get a payment or stay in the Class?**

Unless you timely and validly exclude yourself, you are a Member of the Settlement Class, and that means that you will not be able to sue, continue to sue, or be part of any other lawsuit against the Defendants or the Released Persons about the Released Claims in this case. It also means that all of the Court's orders will apply to you and legally bind you, releasing your claims in this case against the Defendants. The terms of the Release are included in the Claim Form that is enclosed.

### **EXCLUDING YOURSELF FROM THE SETTLEMENT**

If you do not want a payment from this Settlement, but you want to keep the right to attempt to sue or continue to sue Defendants on your own for the Released Claims in this case, then you must take steps to get out of the Settlement Class. This is called excluding yourself or is sometimes referred to as opting out of the Settlement Class.

## **13. How do I get out of the settlement?**

To exclude yourself from the Settlement Class, you must send a letter by mail stating that you want to be excluded from *Brown v. China Integrated Energy, Inc.*, Case No. 11-cv-02559-BRO-PLA. You must include your name, address, telephone number, your signature, and the number of shares of China Integrated stock you purchased during the Settlement Class Period, the dates of such purchases, the prices paid per share for each purchase, and any sales. You must mail your exclusion request postmarked no later than **May 27, 2016**, to the Claims Administrator at:

China Integrated Securities Litigation Settlement – EXCLUSION REQUEST  
c/o Angeion Group  
1801 Market Street, Suite 660  
Philadelphia, PA 19103

You cannot exclude yourself on the phone or by e-mail. If you ask to be excluded, you are not eligible to receive any settlement payment, and you cannot object to the Settlement. If you ask to be excluded in the way set forth above, you will not be legally bound by anything that happens in this lawsuit.

## **14. If I don't exclude myself, can I sue Defendants for the same thing later?**

No. Unless you timely and validly exclude yourself, you give up any right to sue any Defendants or the Released Parties for the Released Claims in this Settlement. Remember, the exclusion deadline is **May 27, 2016**.

## **15. If I exclude myself, can I get money from this Settlement?**

No. If you exclude yourself, you will not receive any money from the Settlement, and you should not send in a Claim Form.

## THE LAWYERS REPRESENTING YOU

### 16. Do I have a lawyer in this case?

The Court appointed the law firm of Abraham Fruchter & Twersky LLP to represent you and other Settlement Class Members. These lawyers are called Lead Counsel or Class Counsel. You will not be personally liable for the fees and expenses incurred by these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

### 17. How will the lawyers be paid?

Lead Counsel will ask the Court for an award of attorneys' fees not to exceed 25% of the Settlement funds, and reimbursement of up to \$375,000 for incurred litigation expenses. The request for litigation expenses may include a request for reimbursement of the costs and expenses of Plaintiffs in accordance with 15 U.S.C. § 78u-4(a)(4), and incentive award up to \$10,000 each for representing the Settlement Class. Such fees and expenses as may be approved by the Court will be paid from the Settlement funds. Settlement Class Members are not personally liable for any such fees and expenses.

The attorneys' fees awarded will be the only payment to Lead Counsel for their efforts in achieving this Settlement and for their risk in undertaking this representation on a wholly contingent basis. Lead Counsel has not been paid for their services in conducting this litigation on behalf of Plaintiffs and the Settlement Class. To date, the Court has only ordered reimbursement of \$100,000 for incurred and paid litigation expenses from the Sherb settlement. The fees requested will compensate Lead Counsel for their work in achieving the Settlement Fund. The Court determines what counsel should receive from the Settlement Fund for fees and expenses, and may award less than this amount.

## OBJECTING TO THE SETTLEMENT

You can tell the Court that you do not agree with the Settlement or some part of it.

### 18. How do I tell the Court that I don't like the Settlement?

If you are a Settlement Class Member (and you have not excluded yourself), you can object to the Settlement if you do not like any part of it, including the Plan of Allocation and the request for attorneys' fees and expenses. You can state the reasons why you think the Court should not approve it, and the Court will consider your views. To object, you must file an objection, including any papers and briefs, with the Clerk of the United States District Court for the Central District of California, on or before June 20, 2016. The objection must state you object to the Settlement in *Brown v. China Integrated Energy, Inc.*, Case No. 11-cv-02559-BRO-PLA, and you must include your name, address, telephone number, your signature, the number of shares of China Integrated stock purchased during the Settlement Class Period, the dates of purchases and of any sales, and the reasons you object. Any objection must be also be mailed or delivered such that it is received by all of the following no later than **June 20, 2016**:

Class Counsel	Claims Administrator	Defendants' Counsel
Takeo Kellar, Esq. Ian Berg, Esq. ABRAHAM, FRUCHTER & TWERSKY LLP 11622 El Camino Real, Suite 100 San Diego, CA 92130	China Integrated Securities Litigation Settlement – OBJECTION c/o Angeion Group 1801 Market Street, Suite 660 Philadelphia, PA 19103	Eugene R. Licker, Esq. LOEB & LOEB LLP 345 Park Avenue New York, NY 10154 and Peter C. Buckley, Esq. FOX ROTHSCHILD LLP 2000 Market St., 20th Floor Philadelphia, PA 19103-3222

## **19. What's the difference between objecting and excluding?**

Objecting is simply telling the Court that you do not like something about the Settlement. You can object only if you stay in the Settlement Class. Excluding yourself is telling the Court that you do not want to be part of the Settlement Class. If you exclude yourself, you have no basis to object because the case no longer affects you. To be clear, if you exclude yourself, you should not also file an objection to the settlement.

If you file an objection to the Settlement but fail to timely file the enclosed Claim Form described in Question 10, you may be deemed to have released all of the Released Claims against China Integrated as set forth in Question 14 above but will receive no proceeds under the Settlement.

## **THE COURT'S FAIRNESS HEARING**

The Court will hold a hearing to decide whether to approve the Settlement. You may attend and you may ask to speak, but you do not have to.

## **20. When and where will the Court decide whether to approve the Settlement?**

The Court will hold a **hearing at 1:30 p.m., on July 11, 2016**, at United States District Court for the Central District of California, 312 N. Spring Street, Los Angeles, CA 90012. At this hearing the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court will also consider how much of an expense award to grant Lead Counsel and whether the Plan of Allocation is fair, reasonable, and adequate. The Court may decide these issues at the hearing or take them under consideration for a later decision. We do not know how long these decisions will take.

## **21. Do I have to come to the hearing?**

No. Lead Counsel will answer any questions Judge Beverly Reid O'Connell may have. But, you are welcome to come at your own expense. If you send an objection, you do not have to come to Court to talk about it. As long as you mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

## **22. May I speak at the hearing?**

Only Settlement Class Members who have filed and delivered valid and timely written notices of objection and requested an opportunity to speak will be entitled to be heard at the hearing on July 11, 2016. To do so, you must send a letter saying that it is your intention to appear in *Brown v. China Integrated Energy, Inc.*, Case No. 11-cv-02559-BRO-PLA. Be sure to include your name, address, telephone number, your signature, the number of shares of China Integrated stock purchased during the Settlement Class Period, and the dates of purchases and of any sales. If you intend to call any witnesses to testify or introduce any exhibits into evidence at the Final Settlement Hearing, you must also identify them in the letter. Your notice of intention to appear must be received no later than June 20, 2016, by the Clerk of the Court, United States District Court for Central District of California, Western Division, and the Parties' counsel at the addresses listed in Question 18. You cannot speak at the hearing if you exclude yourself from the Settlement Class.

## **IF YOU DO NOTHING**

## **23. What happens if I do nothing at all?**

If you do nothing, you will be a Settlement Class Member. But you will not receive any money from this Settlement unless you submit a claim form. Unless you exclude yourself, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Defendants about the Release Claims in this case.

## GETTING MORE INFORMATION

### 24. Are there more details about the settlement?

This Notice summarizes the proposed Settlement. More details are in the Stipulation of Settlement dated as of December 9, 2015. You can obtain a copy of this Stipulation by contacting either of the following:

Claims Administrator:

China Integrated Securities Litigation Settlement  
c/o Angeion Group  
1801 Market Street, Suite 660  
Philadelphia, PA 19103  
Telephone: 1-877-300-3441  
Website: [www.ChinaIntegratedSettlement.com](http://www.ChinaIntegratedSettlement.com)  
Email: [ChinaIntegrated@AngeionGroup.com](mailto:ChinaIntegrated@AngeionGroup.com)

Class Counsel:

Takeo Kellar, Esq.  
Ian Berg, Esq.  
Abraham Fruchter & Twersky LLP  
11622 El Camino Real, Suite 100  
San Diego, CA 92130  
Telephone: (858) 764-2580

The Motions for Approval of the Settlement and Litigation Costs and Expenses will be available for review as part of the Court's files in this matter at the Clerk of Court or via PACER.

### **DO NOT TELEPHONE THE COURT REGARDING THIS NOTICE.**

#### **SPECIAL NOTICE TO BANKS, BROKERS, AND OTHER NOMINEES**

The Court has ordered that if you hold or held any China Integrated stock purchased or acquired between March 31, 2010 and April 21, 2011, inclusive, as nominee for a beneficial owner, then, within ten (10) days after you receive this Notice, you must either: (1) send a copy of this Notice by first class mail to all such Persons; or (2) provide a list of the names and addresses of such Persons to the Claims Administrator (send email to [ChinaIntegrated@AngeionGroup.com](mailto:ChinaIntegrated@AngeionGroup.com) or see Answer to Question 24 for additional contact information).

If you choose to mail the Notice and Claim Form yourself, you may obtain from the Claims Administrator (without cost to you) as many additional copies of these documents as you will need to complete the mailing. If you do not intend to comply with the provision of this section you are requested to notify the Claims Administrator of that fact.

Regardless of whether you choose to complete the mailing yourself or elect to have the mailing performed for you, you may obtain reimbursement for reasonable administrative costs actually incurred in connection with forwarding the Notice and which would not have been incurred but for the obligation to forward the Notice, upon submission of appropriate documentation to the Claims Administrator.