

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT
HARTFORD DIVISION**

Beth Andrew-Berry, individually and as a representative of the GWA, LLC 401(k) Profit Sharing Plan and a class of similarly situated persons,

Plaintiff,

v.

George A. Weiss and GWA, LLC,

Defendants.

Case No.: 3:23-CV-00978-OAW

August 4, 2025

**DECLARATION OF BETH ANDREW-BERRY IN SUPPORT OF PLAINTIFF'S
MOTIONS AND INCORPORATED MEMORANDA OF LAW FOR ATTORNEYS'
FEES, EXPENSES, AND CLASS REPRESENTATIVE SERVICE AWARD AND FINAL
APPROVAL OF CLASS ACTION SETTLEMENT**

I, Beth Andrew-Berry, declare and state as follows:

1. I have been preliminarily appointed as the Class Representative for the purpose of the Settlement in the above-captioned action. I submit this Declaration in support of Plaintiff's Motions and Incorporated Memoranda of Law For Attorneys' Fees, Expenses, and Class Representative Service Award and Final Approval of the Class Action Settlement.

2. I was a participant in the GWA, LLC 401(k) Profit Sharing Plan (formerly known as the George Weiss Associates, Inc. 401(k) Profit Sharing Plan) (the "Plan") from approximately 2016 to this year. I rolled my balance out of the Plan for the March 31, 2025 valuation period and received the funds into my Rollover IRA in May of 2025, after receiving a letter from the Plan's

recordkeeper informing me that “*the firm intends to close*” and stating, “We would like to have your account paid to you in the manner you choose as soon as possible.”

3. As a participant in the Plan, my retirement account was invested in the Weiss Multi-Strategy Partners (Cayman) Ltd. Fund and the Weiss Alternative Multi-Strategy Fund during the relevant class period.

4. Before commencing this lawsuit, I raised my concerns about Defendant George Weiss’s mismanagement of the Plan directly with Defendant GWA, LLC (“GWA”). I demanded changes to the administration of the Plan and restoration of losses to the Plan caused by Mr. Weiss’s mismanagement.

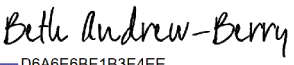
5. I have actively participated in this case. Among other things, I: (1) contacted Class Counsel, who are ERISA specialists, to discuss my concerns with the performance of the Plan’s investments; (2) assisted counsel in the investigation of this matter; (3) provided Class Counsel with critical evidence of Defendants’ breaches; (4) identified key witnesses and sources of information; (5) reviewed case materials (pleadings, settlement agreement, etc.); (6) produced documents to Defendants as part of my initial disclosures; and (7) regularly communicated with Class Counsel about the case.

6. I am fully informed of the terms of the Settlement and have had the opportunity to discuss the Settlement with counsel. I believe the \$7.9 million recovery is a fair recovery for myself and other Class Members in light of the delay and substantial risks of non-payment of any potential judgement from both Defendants—GWA and George Weiss—who are in bankruptcy proceedings.

7. I approve the Settlement in this case and believe the Court should approve the Settlement.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: August 4, 2025

Signed by:

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Beth Andrew-Berry