

**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
**OFFICE OF THE ATTORNEY GENERAL**

**ATTORNEY GENERAL**  
**BRIAN L. SCHWALB**  
**PUBLIC ADVOCACY DIVISION**



**NOTICE OF SETTLEMENT**

The Office of the Attorney General for the District of Columbia (“OAG”) enforces the wage laws of the District of Columbia (“District”). On December 9, 2021, OAG filed a lawsuit against Azure Healthcare Services, LLC (“Azure”) alongside Azure co-owners Beth Henson and Cynthia Warren (together, “Defendants”). The lawsuit alleged that the Defendants violated several District wage laws, including requiring employees at certain facilities in the District to work twenty-four-hour shifts without payment for all hours worked. On January 13, 2023, OAG and the Defendants reached a settlement of the lawsuit, which was entered by the court as a consent order on January 19, 2023. The claims process was delayed by bankruptcy proceedings that have now concluded.

If you worked agreed upon “Wave” schedules for Azure as a Direct Support Professional in the District of Columbia between approximately April 1, 2020 and May 31, 2021, you may be entitled to benefits under the settlement. This notice provides information about the lawsuit, benefits you may be entitled to under the settlement, and your rights under the settlement.

**1. What is the lawsuit about?**

On December 9, 2021, OAG filed a lawsuit against Azure, Beth Henson and Cynthia Warren in the Superior Court of the District of Columbia (*District of Columbia v. Azure Healthcare Services, LLC, et al.*, Case No. 2021-CA-004593-B). The lawsuit alleged that the Defendants violated several District laws, including failure to pay minimum and overtime wages.

**2. Why did I get this notice?**

OAG and the Defendants have reached a settlement of the lawsuit. Under the terms of the settlement, many individuals who worked as a Direct Support Professional for Azure in the District of Columbia on a “Wave” schedule between April 1, 2020 and May 31, 2021 are eligible to receive monetary restitution under the settlement (an eligible worker is hereinafter referred to as an “Eligible Claimant”). You have received this notice because Defendants’ records indicate that you are an Eligible Claimant. OAG has retained Analytics Consulting LLC as a Settlement Administrator to assist with distributing settlement proceeds to Eligible Claimants.

**3. Why did this case settle?**

OAG and the Defendants reached a settlement in order to avoid the risk and expense of further litigation. OAG believes the settlement is fair, adequate, and in the interest of Eligible Claimants in light of the facts of the case, the consumption of time and resources required to further litigate the lawsuit, and the uncertainties and risks of further litigation. The settlement resolves the lawsuit in its entirety.

**4. Has the Court decided who is right?**

No. The Court has made no decision regarding the merits of OAG’s allegations or the Defendants’ defenses.

**5. What are the terms of the settlement?**

The Total Settlement Amount is for \$1,510,000.00. This Total Settlement Amount is split into the following categories: (a) \$200,000.00 in penalties paid to the District of Columbia and (b) \$1,310,000 in restitution (the “Restitution Amount”) paid to Eligible Claimants.

**6. How much will I receive under the settlement?**

Payments to each Eligible Claimant from the Restitution Amount (the “Claim Amount”) have been determined using the Defendants’ records to calculate amounts owed. You are an Eligible Claimant entitled to receive an estimated Claim Amount of **\$XX.XX**, subject to deductions for applicable taxes and withholdings.

**7. What do I have to do to receive a share of the settlement?**

If you wish to receive the Claim Amount owed to you under this settlement, you must complete the attached Substitute W9 form and transmit it to the Settlement Administrator before **May 6, 2026**. You may either send your W9 form by email to [AzureSettlementDC@noticeadministrator.com](mailto:AzureSettlementDC@noticeadministrator.com) or by mail to:

Azure Settlement Administrator  
c/o Analytics Consulting LLC  
PO Box 2002  
Chanhassen MN 55317-2002  
Toll Free: 888-687-6952  
Website: [www.AzureSettlementDC.com](http://www.AzureSettlementDC.com)

**8. Do I need a lawyer to receive a share of the settlement?**

You do not need to hire your own lawyer to receive a share of the settlement. OAG’s settlement of this lawsuit has secured restitution due to you in the amount of the Claim Amount. However, please note that OAG is not your lawyer and cannot provide you with any legal advice. If you wish to hire your own lawyer, you are free to hire one at your own expense.

**9. How can I receive more information?**

This notice is a summary of the basic terms of the settlement. For the precise terms and conditions of the settlement, you may review the Consent Order at [www.AzureSettlementDC.com](http://www.AzureSettlementDC.com) or on file with the Clerk of the Superior Court for the District of Columbia. In addition, pleadings and other records in this litigation may also be examined through the Clerk of the Court. The Clerk of the Court’s address is 500 Indiana Ave. N.W., Washington, D.C. 20001. The Clerk of the Court also makes court records searchable and available online at: <https://www.dccourts.gov/superior-court/cases-online>.

For further information, you can contact the Settlement Administrator at the address or telephone number below.

Azure Settlement Administrator  
c/o Analytics Consulting LLC  
PO Box 2002  
Chanhassen, MN 55317-2002  
Toll Free: 888-687-6952  
Email: [AzureSettlementDC@noticeadministrator.com](mailto:AzureSettlementDC@noticeadministrator.com)  
Website: [www.AzureSettlementDC.com](http://www.AzureSettlementDC.com)

**PLEASE DO NOT TELEPHONE THE COURT, THE CLERK OF THE COURT, OR DEFENDANTS’  
COUNSEL FOR INFORMATION REGARDING THIS SETTLEMENT**