**UNITED STATES DISTRICT COURT**
**DISTRICT OF MASSACHUSETTS**

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| UNITED STATES OF AMERICA *ex rel.* AIDAN FORSYTH,<br><br>*Plaintiff*,<br>v.<br><br>CHROMA SYSTEMS SOLUTIONS, INC.,<br><br>*Defendant.* | No. 25-cv-10052-ADB<br><br>**UNDER SEAL** |

**UNITED STATES' NOTICE OF ELECTION TO INTERVENE**
**FOR PURPOSES OF SETTLEMENT AND MOTION TO UNSEAL**

Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(2) and (4), the United States notifies the Court of its decision to intervene in this action solely for the purposes of settlement with the defendant, Chroma Systems Solutions, Inc. ("Chroma").

The United States, the relator, and Chroma have executed a settlement agreement effective October 20, 2025 (the "Settlement Agreement"), which resolves this False Claims Act action. The United States and the relator will promptly file a Joint Notice of Stipulation of Dismissal after Chroma has made payment pursuant to the terms of the Settlement Agreement.

The United States respectfully requests that the Court unseal this action, the relator's Complaint, this Notice, and all pleadings filed thereafter. The United States further requests that all other papers on file in this action prior to October 20, 2025, remain under seal because, in discussing the content and extent of the United States' investigation, the United States provided such papers to the Court alone for the sole purpose of the Court's evaluating whether it should extend the seal. The relator assents to this motion to unseal. A proposed order is attached to this notice.

Date: October 20, 2025

Respectfully submitted,

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United States Attorney

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**CERTIFICATE OF SERVICE**

I certify that, on October 20, 2025, I caused a copy of the foregoing document to be served by e-mail on the following counsel (with counsel's assent to electronic service):

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Dated: October 20, 2025

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