

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MICHIGAN

**NOTICE
IF YOU WERE A STUDENT AT GLOBAL COLLEGE OF NATURAL MEDICINE,
A CLASS ACTION LAWSUIT MAY AFFECT YOUR RIGHTS.**

*A court authorized this notice.
This is not a solicitation from a lawyer.*
YOU ARE NOT BEING SUED.

- A lawsuit has been filed against Global College of Natural Medicine, Inc. (“GCNM”) and its owner Heather Johnstone (“Johnstone”) alleging claims for breach of contract, negligence, unjust enrichment, bailment, fraudulent concealment and omission, and others. The lawsuit alleges that GCNM students were harmed when GCNM abruptly shut down in November 2012 after enrolling students who paid substantial tuition in advance for self-paced distance-education courses that GCNM stopped providing.
- The Court is allowing the lawsuit to be a class action on behalf of all students who entrusted tuition in advance to GCNM and were active students as of November 2012 when the school closed.
- There is no money available now, and no guarantee there will be. However, your legal rights are affected, and you have a choice to make now:

| YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT | |
|--|--|
| DO NOTHING | Stay in this lawsuit. Await the outcome. Give up certain rights. By staying in this lawsuit, you have the possibility of getting money or benefits that may come from this lawsuit or a settlement, but you have the risk that you will not get any money or benefit from the lawsuit. By staying in this lawsuit, you give up any rights to sue GCNM separately about the same legal claims in this lawsuit. By doing nothing now, you will become a party to this lawsuit and join in the Plaintiffs’ theory for recovery. |
| ASK TO BE EXCLUDED | Get out of this lawsuit. Get no benefits from it. Keep rights. If you ask to be excluded and money or benefits are later awarded, you won’t share in those. But, you keep any rights to sue GCNM separately about the same legal claims in this lawsuit. |

Your legal rights and these options are explained in more detail in this notice. To ask to be excluded, you must act before **October 9, 2015**. Also, students who wish to get their own lawyer must do so by that same date.

- If you stay in the lawsuit and money or benefits are obtained from GCNM, you will be notified about how to ask for a share. If you remain in the suit and money or benefits are not obtained from GCNM, you will be notified of that as well.
- **After reading this notice, if you still have questions, visit: WWW.GCNMCLASSACTION.COM**

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BASIC INFORMATION

1. Why did I get this notice?

Information gathered in this lawsuit indicates that you may have been enrolled as a student at Global College of Natural Medicine in the past. This notice explains that the Court has allowed, or “certified,” a class action lawsuit brought by and on behalf of GCNM students that may affect you. You have legal rights and options that you may exercise before the Court holds a hearing. The hearing is to decide whether to enter a judgment for the Plaintiffs against GCNM. Federal District Judge Terrence G. Berg of the United States District Court for the Eastern District of Michigan is overseeing this class action. The lawsuit is known as *Toler v. Global College of Natural Medicine, et al*, Civil Action No: 2-13-cv-10433.

2. What is this lawsuit about?

GCNM was a California-based, post-secondary school that offered self-paced distance education programs in natural health fields, including certificate, bachelors, masters and Ph.D. degree programs.

The lawsuit alleges that students entrusted tuition in advance to GCNM for self-paced educational programs but that GCNM shut down before providing the complete education for which Plaintiffs paid. This lawsuit is about whether students who entrusted tuition in advance to GCNM and were active students at GCNM when GCNM closed are entitled to damages.

3. What is a class action and who is involved?

In a class action lawsuit, one or more people called “Class Representatives” (in this case Anita Toler) sue on behalf of themselves and other people who have similar claims. The people together are a “Class” or “Class Members.” Those who sued—and all the Class Members like them—are called the Plaintiffs. Those they sued (in this case GCNM and Johnstone) are called Defendants. One court resolves the issues for everyone in a Class—except for those people who choose to exclude themselves from the Class.

QUESTIONS? CALL (877)540-8333 OR VISIT WWW.GCNMCLASSACTION.COM

4. Why is this lawsuit a class action?

The Court decided that this lawsuit can be a class action because it meets the requirements of Rule 23 of the Federal Rules of Civil Procedure, which governs class actions in federal courts. The Court's Order Certifying the Class is available at WWW.GCNMCLASSACTION.COM.

THE CLAIMS IN THE LAWSUIT

5. What does the lawsuit complain about?

In the lawsuit, the Plaintiffs say that they enrolled in and paid tuition in advance for one or more self-paced distance education programs at GCNM but GCNM shut down before providing them the instruction that they paid for. You can read the Plaintiffs' Class Action Complaint at WWW.GCNMCLASSACTION.COM.

6. How do GCNM and Johnstone answer?

GCNM and Johnstone failed to answer Plaintiffs' allegations in this case. As a result, the Court has entered a default against GCNM and Johnstone. The default establishes as a matter of law that all the allegations made against GCNM and Johnstone by the Plaintiffs in the Class Action Complaint are deemed true.

7. Has the Court decided who is right?

Because the Court entered a default, the allegations against GCNM and Johnstone in Plaintiffs' Complaint are deemed true.

8. What are the Plaintiffs asking for?

The Plaintiffs are asking the Court to order GCNM and Johnstone to pay Plaintiffs and members of the class money damages to compensate them for any harm Plaintiffs suffered.

9. Is there any money available now?

No money or benefits are available now because the Court has not yet entered a final judgment and because it is not known whether any assets will be available from GCNM, Johnstone or another source to pay a judgment. There is no guarantee that money or benefits ever will be obtained. If they are, you will be notified about how to ask for a share.

WHO IS A CLASS MEMBER?

You need to decide whether you are affected by this lawsuit.

10. Am I part of the Class?

Judge Berg decided that any student who entrusted tuition in advance to GCNM and was an active student as of November 2012 is a member of the Class.

11. Who is included?

The Class includes all persons who enrolled at GCNM, entrusted tuition in advance to GCNM, and were active students as of November 2012.

12. Are any students not included in the Class?

If you did not entrust tuition in advance to GCNM or were not an active student as of November 2012, you are not included.

13. I'm still not sure if I am included.

If you are not sure whether you are included, you can get free help at WWW.GCNMCLASSACTION.COM, or by calling the phone number or writing to the address listed in question 23.

YOUR RIGHTS AND OPTIONS

You have to decide whether to stay in the case or ask to be excluded before the hearing, and you have to decide this now.

14. What happens if I do nothing at all?

You don't have to do anything now if you want to keep the possibility of getting money or benefits from this lawsuit. If you qualify to be a member of the Class, by doing nothing you will be staying in the Class. If you stay in and the Plaintiffs obtain money or benefits, either as a result of a judgment or settlement or other actions, you will be notified about how to apply for a share (or how to ask to be excluded from any settlement). Keep in mind that if you do nothing now, regardless of whether the Plaintiffs win or lose at the hearing, you will not be able to sue, or continue to sue, GCNM or Johnstone—as part of any other lawsuit or legal proceeding—about the same legal claims that are the subject of this lawsuit. This means that if you do nothing, you may only be able to sue for claims other than those raised in this lawsuit. By doing nothing, you will become a party to this lawsuit and join in the Plaintiffs' theory for recovery. You will also be legally bound by all of the Orders the Court issues and judgments the Court makes in this class action.

15. Why would I ask to be excluded?

If you already have your own lawsuit against GCNM or Johnstone and want to continue with it, you need to ask to be excluded from the Class. If you do not want to recover damages from GCNM or Johnstone on the theories set forth by the Plaintiffs, you need to ask to be excluded from the Class. If you exclude yourself from the Class—which also means you remove yourself from the Class, sometimes called “opting-out” of the Class—you won’t get any money or benefits from this lawsuit even if the Plaintiffs obtain them as a result of a judgment, or from any settlement (that may or may not be reached) between the parties in this matter. However, you may then be able to sue or continue to sue GCNM and Johnstone. If you exclude yourself, you will not be legally bound by the Court’s rulings in this class action.

If you start your own lawsuit after you exclude yourself, you’ll have to hire and pay your own lawyer for that lawsuit, and you’ll have to prove your claims. If you do exclude yourself so you can start or continue your own lawsuit, you should talk to your own lawyer soon, because you may not be able to bring claims after a certain date.

16. How do I ask the Court to exclude me?

To ask to be excluded, you must send an “Exclusion Request” in the form of a letter by mail, stating that you want to be excluded from *Toler v. GCNM*. Be sure to include your name and address, and sign the letter. You must mail your Exclusion Request postmarked by **October 9, 2015** to: GCNM Class Action, 6895 Telegraph Road, Bloomfield Hills, MI 48301.

THE LAWYERS REPRESENTING YOU

17. Do I have a lawyer in this case?

The Court decided that attorneys Thomas Howlett and Dean Googasian of The Googasian Firm, P.C., of Bloomfield Hills, Michigan, are qualified to represent you and all Class Members as “Class Counsel.” These attorneys are experienced in handling similar cases. More information about Class Counsel, the law firm, their practices, and their experience is available at WWW.GOOGASIAN.COM.

18. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you want your own lawyer, you will have to pay that lawyer. For example, you can ask him or her to appear in Court for you if you want someone other than Class Counsel to speak for you. If you choose to hire your own lawyer, the lawyer must file an appearance with the Court on your behalf, by **October 9, 2015**.

19. How will the lawyers be paid?

If Class Counsel get money or benefits for the Class, they will ask the Court for fees and expenses. You won’t have to pay these fees and expenses. If the Court grants Class Counsel’s request, the fees and expenses would be either deducted from any money obtained for the Class or paid separately by Defendants.

THE HEARING

The Court may hold a hearing to decide whether to enter judgment for the Plaintiffs.

20. How and when will the Court decide who is right?

The judge may hold a hearing to determine whether to enter judgment for Plaintiffs. The hearing may be held in the Federal Building and U.S. Courthouse, 600 Church Street, 2nd Floor, Flint, Michigan 48502, in the Courtroom of the Honorable Terrence G. Berg. The Court has not set a date for the hearing. During the hearing, the Judge may hear arguments and evidence to help reach a decision whether to enter a judgment for Plaintiffs and the amount of damages GCNM and Johnstone owe Class Members, if any. There is no guarantee that the Plaintiffs will win, or that they will get any money for the Class if they win.

21. Do I have to come to the hearing?

You do not need to attend the hearing. Class Counsel will present the case for the Plaintiffs and members of the class. You or your own lawyer are welcome to come at your own expense.

22. Will I get money after the hearing?

If the Plaintiffs obtain money as a result of the hearing or a settlement, you will be notified about how to participate. We do not know how long this will take or whether the Plaintiffs will obtain any money for the class.

GETTING MORE INFORMATION

23. Are more details available?

Visit the website, WWW.GCNMCLASSACTION.COM, where you will find the Court’s Order Certifying the Class and the Class Action Complaint that the Plaintiffs submitted. You may also call (877) 540-8333, e-mail GCNMLAWSUIT@GOOGASIAN.COM or write to: GCNM Class Action, 6895 Telegraph Road, Bloomfield Hills, MI 48301 for further information.