

**If you purchased a “Trump University” program,
two class action lawsuits may affect your rights.**

A Federal Court authorized this Notice. This is not a solicitation from a lawyer.

This notice explains that the Court has allowed (“certified”) two class action lawsuits that may affect you. The lawsuits claim Trump University, LLC (“Trump University”) and Donald J. Trump (“Trump”) misleadingly marketed “Live Events” seminars and mentorships as teaching Trump’s real estate techniques through his “hand-picked” professors at his so-called university. Plaintiffs allege these representations were false and violated the law and purchasers should get their money back. The Court has not decided whether Trump University or Trump did anything wrong. There is no money available now, nor is there any guarantee that there will be. However, your legal rights are affected, and you have a choice to make now.

The Honorable Judge Gonzalo P. Curiel of the United States District Court for the Southern District of California is overseeing these class actions. The lawsuits are known as *Cohen v. Donald J. Trump*, Case No. 3:13-cv-02519 and *Makaeff, et al. v. Trump University, LLC, et al.*, Case No. 3:10-cv-00940. You have legal rights and options that you may exercise before the Court holds a trial to decide whether the claims against Trump University and Trump, on your behalf, are correct. No trial date is set.

WHAT DO THE LAWSUITS CLAIM?

The Cohen (Nationwide) Action: A Trump University “student” sued Donald J. Trump for falsely promising access to his real estate techniques taught by his “hand-picked” professors at his elite “university.” Mr. Cohen alleges Trump’s failure to deliver at Trump University Live Event seminars and mentorships violated the Racketeer Influenced and Corrupt Organizations Act (“RICO”).

The Makaeff (California/Florida/New York) Action: In a separate case, other “students” sued Trump University and Trump for similarly promising, but failing to deliver Trump’s real estate

secrets at his “university,” or provide one-year mentorships in violation of state laws, including elder financial abuse statutes.

WHO IS INCLUDED?

You are receiving this notice because records show you are a member of one or both of the Classes certified by the Court. If you purchased a “Trump University” Live Event – which includes live seminars and in-field mentorships such as the 3-day “Fulfillment” or “Elite” programs – and have not received a full refund, you may be a part of the Class in the Cohen and/or Makaeff Actions. If the lawsuits are successful, you may be entitled to your money back plus additional damages. If you were over the age of 60 at the time you purchased a “Trump University” Live Event in the State of Florida, or were over the age of 65 and resided in the State of California at the time you purchased a “Trump University” Live Event in that state, you may be part of the elder financial abuse “subclasses.”

WHAT IS THE STATUS OF THE LAWSUITS?

On October 24, 2014, the Court issued an order certifying the Cohen Action as a nationwide class action of Trump University Live Event purchasers across the United States, who have not received full refunds. On February 21, 2014, the Court previously certified the Makaeff Action as a class action for individuals who purchased, and have not received full refunds for, Trump University Live Events in California, New York and Florida. These cases are proceeding simultaneously. If you purchased a Live Event in California, New York or Florida, you may be a member of both the Makaeff and Cohen Actions.

QUESTIONS? CALL 1-866-841-7311 OR VISIT www.trumpuniversitylitigation.com

WHAT IF I WAS AGE 60 OR OLDER AT THE TIME OF PURCHASE?

If you were *over the age of 60* at the time you purchased “Trump University” Live Events *in Florida*, Trump University and Trump may be fined under State of Florida laws protecting senior citizens from financial abuse. If you were over the *age of 65 and resided in California* when you purchased “Trump University” Live Events in that state, Trump University and Trump may be fined, and you may be entitled to additional money under California laws protecting senior citizens from financial abuse. To identify senior citizen Class Members, there is a self-addressed, postage-prepaid postcard included with this notice. If you were over the age of 60 at the time you purchased a “Trump University” Live Event in California or Florida, please fill this postcard out and return it, so you can be kept updated on how the lawsuits may affect you. If you choose not to complete the postcard, your status as a Class Member will not be affected.

WHO REPRESENTS ME IN THE LAWSUITS?

The Court decided that the law firms of Robbins Geller Rudman & Dowd LLP and Zeldes Haeggquist & Eck, LLP, both in San Diego, California, are qualified to represent you and all Class Members. These firms are called “Class Counsel.” The law firms are experienced in handling similar class action cases. More information about the firms, their practices, and their lawyers’ experience is available at www.rgrdlaw.com and www.zhllaw.com.

Class Counsel is working on your behalf. You may hire your own lawyer, but you don’t have to. 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 Class Counsel recovers money or benefits for the Classes, they may ask the Court for fees and expenses. You will not have to pay these fees and expenses. If the Court grants Class Counsel’s request, the fees and expenses would either be

deducted from any money obtained for the Classes or paid separately by Trump University or Trump or both.

WHAT ARE YOUR OPTIONS?

If you wish to remain a member of one or both Classes and possibly get money in the cases, you do not need to do anything now. If you remain in either or both Classes, you will be legally bound by all Orders and Judgments the Court makes. If you do not want to be a part of either or both lawsuits, you must take steps to exclude yourself (sometimes called “opting-out”). If you exclude yourself, you cannot receive money from the lawsuit – if any is won – but you will not be bound by any Court Orders or Judgments. If you want to start or continue your own lawsuit against Trump University and Trump regarding their Live Events, you must exclude yourself.

To ask to be excluded, you must send an “Exclusion Request” in the form of a letter sent by U.S. mail, stating that you want to be excluded from *Makaeff, et al. v. Trump University, LLC., et al.*, Case No. 3:10-cv-00940 and/or *Cohen v. Donald J. Trump*, Case No. 3:13-cv-02519. Be sure to include your name and address, and sign the letter. You must mail your Exclusion Request postmarked by November 16, 2015, to: Trump University Litigation Administrator, P.O. Box 4109, Portland, OR 97208-4109. You may also get an Exclusion Request form at www.trumpuniversitylitigation.com.

Detailed information about the class claims in the lawsuits, court rulings, and your rights and options is available at the website and toll-free number listed below.

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