

If you ever signed up to become a Jeunesse Distributor, you could get a payment from a class action settlement.

A federal court authorized this Notice. This is not a solicitation from a lawyer.

- The proposed settlement will provide \$2.5 million to pay claims and expenses for those who signed up to become Jeunesse distributors intending to build businesses, and who meet at least one of the conditions below. Approximately \$1 million of this amount may be used to pay attorneys' fees and settlement administration expenses.
- To qualify, you must have signed up to be a Jeunesse distributor after January 1, 2010, and before September 13, 2018, purchased a Jeunesse Starter Kit, and satisfy at least one of the following:
 - **Never recouped the cost of your Starter Kit in commissions; and/or**
 - **Discarded or still possess Jeunesse products you intended to sell, but were unable to sell.**

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:	
SUBMIT A CLAIM FORM	The only way to get a payment.
EXCLUDE YOURSELF	Get no payment. This is the only option that allows you to ever be part of any other lawsuit against Jeunesse about the legal claims in this case.
OBJECT	Write to the Court about why you don't like the Settlement.
GO TO A HEARING	Ask to speak in Court about the fairness of the Settlement.
DO NOTHING	Get no payment. Give up your rights.

- These rights and options—**and the deadlines to exercise them**—are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the Settlement. Payments will be made if the Court approves the Settlement, and after appeals are resolved. Please be patient.

**QUESTIONS? CALL 1-877-588-5714 TOLL-FREE, OR VISIT
WWW.JEUNESSEDISTRIBUTORSETTLEMENT.COM.**

BASIC INFORMATION

1. Why did I get this Notice?

You or someone in your family may have signed up to become a Jeunesse distributor.

The Court sent you this Notice because you have a right to know about a proposed settlement of a class action lawsuit, and about your options, before the Court decides whether to approve the Settlement. If the Court approves it, and after objections and appeals are resolved, an administrator appointed by the Court will make the payments that the Settlement allows. You will be informed of the progress of the Settlement.

This package explains the lawsuit, the Settlement, your legal rights, what benefits are available, who is eligible for them, and how to get them.

The Court in charge of the case is the United States District Court for the Middle District of Florida, and the case is known as *Aboltin et al., v. Jeunesse, LLC*, Case No. 6:17-cv-01624-PGB-KRS. The people who sued are called Plaintiffs, and the companies and individuals they sued are called the Defendants.

2. What is this lawsuit about?

The lawsuit claimed that Jeunesse Global and the other Defendants engaged in unfair business practices that lured people into paying for a business opportunity that the Defendants knew was rigged against the new distributors. Jeunesse and the Defendants deny they did anything wrong.

3. Why is this a class action?

In a class action, one or more people, called Class Representatives (in this case, James Aboltin and Pamela Knight), sued on behalf of people who have similar claims. All these people are a Class or Class Members. One court resolves the issues for all Class Members, except for those who exclude themselves from the Class. U.S. District Judge Paul Byron is in charge of this class action.

4. Why is there a settlement?

The Court did not decide in favor of Plaintiffs or Defendants. Instead, both sides agreed to a settlement. That way, they avoid the cost of a trial, and the people affected will get compensation. The Class Representative and the attorneys think the Settlement is best for everyone who was injured or exposed.

WHO IS IN THE SETTLEMENT

To see if you will get money from this Settlement, you first have to determine if you are a Class Member.

5. How do I know if I am part of the Settlement?

If Judge Byron approves the Settlement, everyone who fits this description is a Class Member: *All people who signed up to become a Jeunesse distributor and paid money for a Starter Kit between January 1, 2010, and September 13, 2018, and meets at least one of the following criteria:*

Intended to build a business as a Jeunesse distributor, but failed to earn at least the amount he or she paid for the Starter Kit in commissions or product resale; and/or

Purchased one or more Jeunesse products from Jeunesse with the intention of reselling, but was unsuccessful in reselling the product(s).

6. Which Jeunesse distributors are included?

Distributors or former distributors who fall into one or more of the groups below belong to the Settlement Class:

Starter Kit Benefit Group

If you signed up to become a Jeunesse distributor and purchased a Jeunesse Starter Kit with the intention of building a business, but earned less income from the business than the price of the Starter Kit, you are eligible for a payment based on the price of your Starter Kit, less any income you earned.

Discarded/Retained Product Benefit Group

If, as a Jeunesse distributor, you purchased Jeunesse products from Jeunesse with the intention of reselling the product, but were unable to resell the product, and ultimately disposed of the product, you are eligible for a payment up to 50% of the purchase price of the discarded product. If you still possess unsold products in unopened packages, you may return those products to Jeunesse by following Jeunesse's normal return procedures for a 90% refund, even if they are beyond their expiration date, subject to certain conditions.

You don't have to currently be an active Jeunesse distributor to be part of this Settlement. The Class includes all those who signed up and meet at least one of the criteria in Question 5, above.

If you are still not sure whether you are included, you can ask for free help. You can call toll-free at 1-877-588-5714, or email at Info@JeunesseDistributorSettlement.com and ask the Claims Administrator whether you meet the requirements to be included. For more information, you can also visit the website, www.JeunesseDistributorSettlement.com. You can fill out the Claim Form on the website, or print out, complete, and return the Claim Form, so that it is postmarked or submitted no later than **December 31, 2018**, to see if you qualify.

THE SETTLEMENT BENEFITS—WHAT YOU GET

7. What does the Settlement provide?

Jeunesse has agreed to create an Injury Compensation Fund of \$2.5 million to pay Settlement expenses and claims for Class Members who meet the criteria specified for each benefit. Approximately \$1 million of this amount may be used to pay attorneys' fees and settlement administration expenses.

8. What can I get from the Settlement?

Benefits available

The benefits provided under this Settlement are for people who attempted, but ultimately failed, to build a Jeunesse distributorship business. **As a result, if you make a claim for one or more of the benefits below, and you have not yet resigned as a distributor and your distributorship otherwise remains active, Jeunesse will deem you to have resigned as a distributor upon your making a claim for benefits under this settlement.**

Starter Kit Benefit Group

People in the Starter Kit Benefit Group will receive a payment of up to the amount of their Starter Kit purchase.

Discarded/Retained Product Benefit Group

People in the Discarded Product Benefit Group are eligible for a payment of up to 50% of the purchase price of the discarded product. Those who still have unopened products may return those products to Jeunesse by following Jeunesse's normal return procedures and receive a 90% refund, even if those products are beyond their expiration date. Please contact Jeunesse if you have any questions regarding the return procedures.

Your payment will be based on how much you were charged for the relevant products and how many other claims are submitted. If, after all claims are submitted, the claims total more than funds available, the payments will be reduced.

If you are eligible for one or more of the benefits above, you must submit a claim during the claims period, or you will not be able to get a payment under this Settlement for any losses. If you do not submit a claim during the claims period, and in the future you determine you have a claim against the Defendants in this lawsuit, you will have waived your rights. The deadline to file a Claim is **December 31, 2018**.

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HOW YOU GET A PAYMENT—SUBMITTING A CLAIM FORM

9. How can I get a payment?

To qualify for payment, you must fill out a Claim Form online at www.JeunesseDistributorSettlement.com or complete and send in a paper Claim Form, available for download on the website or by calling 1-877-588-5714. The deadline to file a Claim is December 31, 2018.

10. When would I get my payment?

The Court will hold a hearing on **Tuesday, January 8, 2019**, to decide whether to approve the Settlement. If the Court approves the Settlement, there may be appeals. It's always uncertain whether these appeals can be resolved, and resolving them can take time, perhaps more than a year. Everyone who sends in a Claim Form will be informed of the progress of the Settlement. Please be patient.

11. What am I giving up to get a payment or stay in the Class?

Unless you exclude yourself, you are staying in the Class, and that means that you can't sue, continue to sue, or be part of any other lawsuit against Jeunesse about the legal issues in *this* case. The Release of Claims that specifies the legal issues you cannot sue about in the future can be read in full in the Settlement Agreement at www.JeunesseDistributorSettlement.com. The release explicitly includes all claims against Jeunesse, Jeunesse's officers and employees, and all other current and former distributors, that those "Released Persons" committed consumer fraud or violated federal or state laws against operating a "pyramid scheme." It also means that all of the Court's orders will apply to you and legally bind you.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you don't want a payment from this Settlement, but you want keep the right to sue or continue to sue Jeunesse on your own, about the legal issues in this case, then you must take steps to get out. This is called excluding yourself—or is sometimes referred to as "opting out" of the Settlement Class.

12. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must fill out the Opt-Out Form, located on the Settlement website, or send a letter by mail saying that you want to be excluded from *Aboltin et al., v. Jeunesse, LLC*. Be sure to include your name, address, telephone number, and your signature. You must mail your exclusion request postmarked no later than **November 26, 2018**, to the following address:

Jeunesse Distributor Settlement
Exclusions
P.O. Box 5270
Portland, OR 97208-5270

You can't exclude yourself on the phone or by email. If you ask to be excluded, you will not get any Settlement payment, and you cannot object to the Settlement. You will not be legally bound by anything that happens in this lawsuit. You may be able to sue (or continue to sue) Jeunesse in the future.

13. If I don't exclude myself, can I sue Jeunesse for the same thing later?

No. Unless you exclude yourself, you give up the right to sue Jeunesse or the other released persons for the claims that this Settlement resolves. If you have a pending lawsuit, speak to your lawyer in that lawsuit immediately. You must exclude yourself from *this* Class to continue your own lawsuit. Remember, the exclusion deadline is **November 26, 2018**.

14. If I exclude myself, can I get money from this Settlement?

No. If you exclude yourself, do not send in a Claim Form to ask for any money. However, you may sue, continue to sue, or be part of a different lawsuit against Jeunesse.

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THE LAWYERS REPRESENTING YOU

15. Do I have a lawyer in this case?

The Court asked the law firms of Jonathan Batchelor, PLC, of Phoenix, Arizona, and Dickinson Wright, PLLC, of Detroit, Michigan, to represent you and other Class Members. Together, the lawyers are called Class Counsel. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

16. How will the lawyers be paid?

Class Counsel will ask the Court for attorneys' fees and expenses up to \$900,000, and a payment of up to \$2,500 to the Class Representatives, James Aboltin and Pamela Knight. The Court may award less than these amounts. The fees and expenses that the Court awards, and the costs of administering the Settlement, will be paid from the total Settlement funds.

OBJECTING TO THE SETTLEMENT

You can tell the Court that you don't agree with the Settlement or some part of it.

17. How do I tell the Court that I don't like the Settlement?

If you're a Class Member, you can object to the Settlement if you don't like any part of it. You can give reasons why you think the Court should not approve it. The Court will consider your views. To object, you must send a letter saying that you object to *Aboltin et al., v. Jeunesse, LLC*. Be sure to include your name, address, telephone number, your signature, and the reasons you object to the Settlement. Mail the objection to these three different places postmarked no later than **November 26, 2018**:

COURT	CLASS COUNSEL	DEFENSE COUNSEL
Clerk of the Court United States District Court for the Middle District of Florida 401 West Central Boulevard Orlando, Florida 32801	Jonathan S. Batchelor Jonathan Batchelor, PLC 200 W. Portland St., #524 Phoenix, AZ 85003	Jeffrey Jacobson Kelley Drye & Warren LLP 101 Park Ave. New York, NY 10178

18. What is the difference between objecting and excluding?

Objecting is simply telling the Court that you don't like something about the Settlement. You can object only if you stay in the Class. Excluding yourself is telling the Court that you don't want to be part of the Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

THE COURT'S FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the Settlement. You may attend and you may ask to speak, but you don't have to.

19. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Fairness Hearing at **3:00 p.m. on Tuesday, January 8, 2019**, at the United States District Court for the Middle District of Florida, 401 West Central Boulevard, Orlando, Florida 32801, Courtroom 4B.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. The Court will listen to people who have asked to speak at the hearing. The Court may also decide how much to pay Class Counsel. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long these decisions will take.

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20. Do I have to come to the Hearing?

Class Counsel will answer questions the Court may have. However, you are welcome to come at your own expense. If you send an objection, you don't have to come to Court to talk about it. As long as you mailed your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it's not necessary.

21. May I speak at the Hearing?

You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must send a letter saying that it is your "Notice of Intention to Appear in *Aboltin et al., v. Jeunesse, LLC*." Be sure to include your name, address, telephone number, and your signature. Your Notice of Intention to Appear must be postmarked no later than **November 26, 2018**, and be sent to the Clerk of the Court, Class Counsel, and Defense Counsel, at the three addresses in Question 17. You cannot speak at the Hearing if you excluded yourself.

IF YOU DO NOTHING

22. What happens if I do nothing at all?

If you do nothing, you'll get no money from this Settlement. But, unless you exclude yourself, you won't be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Jeunesse or the other released persons about the legal issues in this case, ever again.

GETTING MORE INFORMATION

23. Are there more details about the Settlement?

This Notice summarizes the proposed Settlement. More details are in a Settlement Agreement. You can get a copy of the Settlement Agreement by writing to Jonathan Batchelor, PLC, 200 W Portland St., #524, Phoenix, AZ 85003 or by visiting www.JeunesseDistributorSettlement.com.

24. How do I get more information?

You can call 1-877-588-5714 toll-free; write to Jeunesse Distributor Settlement, Claims Administrator, P.O. Box 5270, Portland, OR, 97208-5270; or visit the website at www.JeunesseDistributorSettlement.com, where you will find answers to common questions about the Settlement, the Claim Form, plus other information to help you determine whether you are a Class Member and whether you are eligible for a payment.