

**RHG Co., Inc. Class Action**  
c/o KCC Class Action Services  
P.O. Box 43034  
Providence, RI 02940-3034

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**LEGAL NOTICE**

IF YOU PURCHASED A VITAL  
NUTRIENTS' PRODUCT  
IN THE UNITED STATES  
BETWEEN AUGUST 1, 2012 AND  
FEBRUARY 27, 2017, YOU MAY  
BE ELIGIBLE TO PARTICIPATE  
IN A CLASS ACTION  
SETTLEMENT.

**1-855-581-1277**

**[www.RHGsettlement.com](http://www.RHGsettlement.com)**



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**RGM**

## **THIS LEGAL NOTICE HAS BEEN APPROVED BY A UNITED STATES DISTRICT COURT**

This Notice concerns a proposed settlement of a class action lawsuit against Defendant RHG & Company, Inc. d/b/a Vital Nutrients. The lawsuit alleges that Defendant violated California state law by labeling Vital Nutrients' products with an unqualified "Made in USA" label and making "Made in USA" representations regarding Vital Nutrients' products. Defendant denies any liability in this case. The Court has not held a trial or ruled in favor of either party on any disputed issues. Defendant and Plaintiff have agreed to settle the matter to avoid the costs of continued litigation.

The proposed Settlement includes all Persons who purchased a Vital Nutrients' product in the United States between August 1, 2012 to February 27, 2017, that contained an unqualified "Made in USA" label or otherwise were represented as being "Made in USA," excluding: (1) RHG & Co., Inc., its officers, directors, employees, and their immediate family members, and (2) any judicial officer hearing this litigation, as well as their immediate family members and employees (collectively, "Class Members").

**Class Members are eligible to receive a cash award.** Class Members who submit a valid claim without adequate proof of purchase shall receive up to \$6.00 per product, up to a maximum of five (5) products per person. Class Members who have proof of having purchased more than five (5) products and submit a valid claim accompanied by adequate proof of purchase shall receive up to \$6.00 per product, up to a maximum of twenty-five (25) products per person. To receive a cash award, Class Members must submit a completed Claim Form online or by mail by November 27, 2017. The Claim Form can be found at [www.RHGsettlement.com](http://www.RHGsettlement.com). Defendant has also agreed to change the manner in which it labels and advertises Vital Nutrients' products, and to pay the named class representative, Heather Maxin, a one-time fee of \$5,000 to reimburse her expenses and time. Defendant also agreed to pay Plaintiff's counsel an amount not to exceed \$270,000, which is inclusive of Class Counsel's expenses and costs. The Court may award less than the amounts requested.

**What are Your Options?** If you submit a claim form or do nothing, you are choosing to stay in the Class. This means you will be legally bound by all orders and judgments of the Court, and you will not be able to sue Defendant about the legal claims resolved by this Settlement. If you stay in the Class you may object to the Settlement. Objections are due by May 30, 2017 and requests to appear are due by June 7, 2017. If you do not want to stay in the Class, you must submit a request for exclusion by May 30, 2017. If you exclude yourself, you cannot get a payment from this settlement, but you will keep any rights to bring suit against Defendant for the same claims in a different lawsuit. The United States District Court, Southern District of California will hold a hearing in this case (*Maxin v. RHG & Co., Inc.* Case No. 3:16-cv-02625-JLS-BLM), on September 28, 2017 at 1:30 p.m. to consider whether to approve: the Settlement, Class Counsel's request for fees and expenses, and the payment to the Class Representative. If approved, the Settlement will release the Released Parties for all released claims, including but not limited to all claims relating to the "Made in USA" representations regarding Vital Nutrients' products. For more information, go to [www.RHGsettlement.com](http://www.RHGsettlement.com), or call **1-855-581-1277**.