

**Report of Organizational Actions
 Affecting Basis of Securities**

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name		2 Issuer's employer identification number (EIN)	
Global Growth Trust, Inc.		26-3859644	
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact	
Client Services	866-650-0650	clientservicesinquiries@cnl.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact		7 City, town, or post office, state, and Zip code of contact	
450 South Orange Avenue		Orlando, FL 32801	
8 Date of action		9 Classification and description	
January 13, 2012		Common stock	
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)
37951T107			

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ On the date of action indicated above, Global Growth Trust (Taxpayer) paid a quarterly stock distribution.
The stock distribution equates to an annualized distribution rate of 8 percent or 0.08 of a share for each share held, payable to all common stockholders of record at the close of business on each day during the preceding calendar year quarter.

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶ The stock distribution is not currently included as a component of gross income (e.g. it is not taxable when received) but will represent a per share basis adjustment.

Upon receiving a distribution of stock exempt from tax (new stock), the stockholder must allocate their basis of the stock with respect to which the new stock was distributed (the "old stock") between the old stock and the new stock. This allocation of basis is based on the relative fair market value of the old and new stock on the date of action.

Please consult your tax advisor for additional guidance.

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ On the date of action, the public offering price of the stock was \$10 per share.

The holding period of the new stock, used to determine whether capital gain or loss on any sale or exchange is long-term or short-term, includes the period the stockholder held the old stock prior to receiving the new stock.

