

Reporting Issuer: Global Growth Trust, Inc.
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Reporting Issuer Contact: Client Services
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Description of organizational action: On June 24, 2010, the Reporting Issuer's board of directors declared a quarterly stock distribution of 0.000219178 of a share of common stock per day on each outstanding share of common stock commencing July 1, 2010. The stock distribution equates to an annualized distribution rate of 8% 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 (the "Distribution Rate and Payment Authorization") commencing July 1, 2010, and ending September 30, 2010 (the "Initial Calendar Quarter"). The Distribution Rate and Payment Authorization is authorized to continue for each calendar quarter thereafter until terminated or amended by the board of directors of Reporting Issuer.

The distribution for the quarter ending September 30, 2011 was paid on October 14, 2011.

Effect of organizational action: Under Internal Revenue Code (IRC) section 305(a), the stock distribution is not currently included as a component of gross income (e.g. it isn't taxable when received). Upon receiving a distribution of stock exempt from tax and as provided for in IRC section 307(a), the stockholder must allocate the basis of the stock with respect to which the new stock was distributed (the "old stock") between the old stock and the new stock. Generally, Treasury Regulation 1.307-1 requires an allocation of basis in proportion to the relative fair market values of the old and new stock on the date of distribution. 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 for which the stockholder held the old stock prior to receiving the new stock.

The public offering price of the stock at the time of the distribution was \$10 per share. As always, you should consult with your tax advisor to determine the impact of the organizational action.

As required under Internal Revenue Code section 6045B and Treasury Regulation 1.6045B-1, the above information is provided to the Internal Revenue Service and to each stockholder. You should consult your tax advisor to assist in determining the impact on your personal investment.