

## **EXHIBIT B**

### **Legal Proceedings**

On April 6, 2022, Aspen was served with a class action claim in Arizona Superior Court, alleging violations of the Arizona Consumer Fraud Act and Unjust Enrichment, based on the class representative's claims that Aspen misstated the quality of its pre-licensure nursing program. This complaint was in response to the AZ Board of Nursing actions against Aspen which led to the university's agreement to teach-out its pre-licensure program. The plaintiff's attorneys requested arbitration (Rule 408 settlement meeting), which occurred on June 29, 2023. A Stipulation of Settlement agreement was reached whereby the Company agreed to pay \$550,000 in exchange for release of all claims of the Settlement Class inclusive of attorneys' fees and costs. Aspen University has E&O insurance with Lloyd's London that provides for a \$500,000 limit of liability (each claim). The Settlement Class includes 53 students who were precluded from entering the BSN Pre-licensure Core Program and first year students who completed more than 15 credit hours toward their pre-requisites. Following a mediation session in June 2023, the parties signed a term sheet settlement in which Aspen agreed to pay \$550,000 in exchange for release of all claims of the settlement class, inclusive of attorneys' fees and costs. The settlement agreement must be approved by the Arizona superior court judge before it can take effect.

On June 1, 2022, Aspen University was sued in Arizona Superior Court by a former student, Elizabeth Burdette Howe, that was previously dismissed from the university. The allegations included the university made course changes without adequate notice, confusion about assignments, an inability to plan her studies, and never having achieved the full direct care hours promised in its curriculum plan, among others. Discovery is not yet scheduled but should begin in the coming months.

In March 2021, United States University, Inc., Aspen Group, Inc., and Steven Stargardt were sued in CA Supreme Court by a former employee, Dianna Scherlin (subsequently deceased), alleging discrimination (age/gender/disability), failure to prevent harassment, breach of contract, among others. A mandatory settlement conference is planned in the coming months.