Insider Trading Agreement and Disclosure Form

I agree to abide by the [Ownership of Stock in For-Profit WSCUC Institutions Policy](https://wascsenior.box.com/s/kiy1q2btlr57i1djcawx) (“Insider Trading Policy”). I understand that the primary purpose of the Insider Trading Policy is to protect WSCUC and me against potentially unlawful conduct by prohibiting stock trades in publicly traded institutions during certain periods in which my involvement with WSCUC may provide me with access to information about these institutions, which is not generally known to the public and might materially affect the price of the stock if known.

In agreeing to abide by the Insider Trading Policy, I agree to the following:

If I am a Commission Member, I agree to:

* Not trade in the stock of any institution (excluding mutual fund ownership) that is defined in the Insider Trading Policy as a For-Profit WSCUC Institution (essentially an institution where the stock of the institution or its system is publicly traded), beginning with my receipt in a Commission or committee meeting agenda packet of any materials concerning the For-Profit WSCUC Institution until such time as the Commission’s or committee’s action on such For-Profit WSCUC Institution is made public.
* Annually disclose on the attached Disclosure Form any ownership interest in any For-Profit WSCUC Institution as defined in the Insider Trading Policy in which I have made an investment of twenty-five thousand dollars ($25,000) or more, excluding mutual fund ownership.
* Disclose and recuse myself from participating in a discussion of and the voting on any For-Profit WSCUC Institution in which I own stock or have made an investment in a For-Profit WSCUC Institution of $25,000 or more, excluding mutual fund ownership.

If I am a Review Team or Committee Member, I agree to:

* Not trade in the stock of any institution (excluding mutual fund ownership) that is defined in the Insider Trading Policy as a For-Profit WSCUC Institution (essentially an institution where the stock of the institution or its system is publicly traded), beginning with my receipt of materials about a For-Profit WSCUC Institution and continuing until such time as the Commission’s action on the institution is made public.
* Annually disclose on the attached Disclosure Form any ownership interest in any For-Profit WSCUC Institution as defined in the Insider Trading Policy in which I have made an investment of twenty-five thousand dollars ($25,000) or more, excluding mutual fund ownership.
* Disclose and remove myself from participation on any visiting team or committee review of a For-Profit WSCUC Institution in which I have made an investment of $25,000 or more, excluding mutual fund ownership.

If I am a Staff Member, I agree to:

* Not trade in the stock of any institution (excluding mutual fund ownership) that is defined in the Insider Trading Policy as a For-Profit WSCUC Institution (essentially an institution where the stock of the institution or its system is publicly traded) during any period in which I possess actual information about the For-Profit WSCUC Institution which is not known to the general public and which could materially affect the price of the stock.
* Annually disclose on a Disclosure Form any ownership interest in any For-Profit WSCUC Institution, as defined in the Insider Trading Policy, in which I have made an investment of any amount, excluding mutual fund.
* Not accept assignment to work with any institution in a liaison role when I have an investment of any amount in a For-Profit WSCUC Institution, excluding mutual funds.

I acknowledge that I have read the Insider Trading Policy and understand that the terms used in this Agreement are defined more precisely therein;

I have executed this Agreement on the date set forth below.

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Signature

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Date

# Disclosure of For-Profit WSCUC Institutions Form

At this time, the following for-profit publicly traded institutions are either accredited, candidates for accreditation, or have formally applied for accreditation with the WSCUC Senior Colleges and University Commission:

1. United States University (Aspen Group Inc.)

Identify all of the above institutions in which you own stock for which you paid twenty-five thousand dollars ($25,000) or more:

1. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

2. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

3. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

4. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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Signature

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Date

*Revised Oct 2022*

*Revised May 2016*

*Revised Jan 2018*