

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA
A proposed class action settlement may affect your rights.

A federal court authorized this notice. This is not a solicitation from a lawyer. You are not being sued.

- There is a proposed settlement in a class action lawsuit entitled *Gloria Turnage v. AION Management LLC, et al.*, No. 3:25cv0840, which claims that AION Management LLC and AP 11 North LLC (“Defendants”) violated the Virginia Consumer Protection Act (“VCPA”) and Virginia Residential Landlord Tenant Act (“VRLTA”) through the assessment and collection of a pest fee, trash removal fee, community amenity fee, and administrative billing fee, which are collectively referred to herein as the “Disputed Fees.” Defendants deny the Plaintiff’s allegations and deny that they are liable to the Plaintiff or any of the putative settlement class members.
- The Plaintiff alleges claims on behalf of herself and a class of similarly situated individuals residing at apartment complexes managed by AION and located in Virginia who were billed for any of the Disputed Fees on leases active between October 10, 2023, and November 1, 2025. According to Defendants’ records, you satisfy this definition and are thus entitled to the relief obtained on behalf of the class members, including cash payments and an agreement that the Disputed Fees will not be included in leases going forward.
- If you do nothing, you will receive a cash payment of approximately \$141. Whether you act or not, your legal rights are affected by the proposed settlement. Your rights and options are explained in this notice. Please read this notice carefully in its entirety.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS PROPOSED SETTLEMENT		
Your Rights and Options	What to Do	Deadlines to Do It
Object to the Settlement	Write to the Court about why you do not like the proposed settlement; for more information regarding objecting, please read Section 9 below.	Postmarked on or <u>before September 8, 2026</u>
Opt out of the Settlement	Write to the Settlement Administrator stating that you do not wish to participate in the proposed settlement. See Section 6 below. If you validly opt out, you will not receive any monetary payments from the settlement.	Postmarked on or <u>before September 8, 2026</u>
Do Nothing	You are not required to take any action to receive the automatic benefits of the proposed settlement. If the proposed settlement is finally approved and you do not opt out, then you will be bound by the Court’s final judgment and the release of claims in the Settlement Agreement.	None

1. Does this Notice apply to me?

You received this Notice because you signed a lease at <<propertyname>> apartment complex in Virginia managed by AION Management LLC between October 10, 2023, and November 1, 2025. Records from AION indicate you are a class member.

This Notice informs you about the proposed settlement and your rights. Before any final judgment is entered, the Court will have a hearing to decide whether to approve the proposed settlement. The proposed settlement will be finally approved only after any objections or appeals are resolved. If the proposed settlement is finally approved, then you will benefit from the relief provided by the proposed settlement. Once the proposed settlement is final, you will also be bound by the release and other provisions of the proposed settlement.

This notice is only a summary of the proposed settlement. More details about the proposed settlement, the date when appeals are no longer allowed and the settlement is final, deadlines for certain actions, and your options are available in a longer document called the Settlement Agreement. You can get a copy of the Settlement Agreement by visiting www.apartmentfeesclassaction.com.

The class action lawsuit is known as *Gloria Turnage v. AION Management LLC, et al.*, No. 3:25cv0840, and is pending in the United States District Court for the Eastern District of Virginia, with Judge Robert E. Payne presiding. The individual who sued is called the Plaintiff; the entities that they sued are called the Defendants. The Plaintiff is Gloria Turnage. The Defendants are AION Management LLC and AP 11 North LLC.

2. What is this lawsuit about?

The lawsuit alleges that Defendants violated the VCPA and VRLTA by making misrepresentations in connection with certain fees and assessing fees that they could not assess under Virginia law. Defendants deny the Plaintiff's allegations and theories of relief and deny that they are liable to the Plaintiff or any of the putative settlement class members. The Court has not decided whether either side is right or wrong. Instead, both sides agreed to settle the case and provide benefits to the class.

The Plaintiff filed this case as a proposed class action. When the parties reached this proposed settlement, the Court had not decided whether the case could be a class action. As part of the proposed settlement, the Court certified a tentative class action for settlement purposes only, under Federal Rule of Civil Procedure 23(b)(3). If the proposed settlement is not finally approved, then the Court will later determine if the case may or may not proceed as a class action.

3. How do I know if I am part of the proposed settlement?

The Court has decided that everyone who fits the following description is a "Settlement Class Member":

All consumers: (1) who executed a lease at any of the AION-Managed Properties and (2) paid or were obligated to pay any Disputed Fee from October 10, 2023 through November 1, 2025.

Because you have received this Notice, you have been identified as a Settlement Class Member.

4. What benefits does the proposed settlement provide?

The proposed settlement provides a monetary payment to all Settlement Class Members from a fund totaling \$776,628. This is approximately, \$141 per Class Member.

Pursuant to the Court's approval, the Defendants will separately pay a Service Award of up to \$7,500 for the Plaintiff, attorneys' fees and costs to Class Counsel in an amount up to \$388,314, and Administrative Costs of the Settlement Administrator in an amount of \$25,000.

As part of the Settlement, Defendants have also agreed to remove the Disputed Fees from leases and lease renewals going forward for a period of five years from the Effective Date of the Settlement.

You will not have to pay or buy anything to benefit from the relief provided by the Settlement.

5. How does the proposed settlement affect my rights?

In general terms, if the proposed settlement is finally approved by the Court, then you will be giving up the right to file a lawsuit against AION Management LLC and its affiliates, including your landlord, <<propertyname>> for claims under the VCPA or VRLTA related to any of the Disputed Fees that arose between October 10, 2023, and November 1, 2025.

The precise terms of the dismissal and release are explained in the Settlement Agreement, which you can view on the settlement website, www.apartmentfeesclassaction.com. The Court's order will apply to you even if you object to the settlement or have any other claim, lawsuit, or proceeding pending against any of the Defendants for violations of the VCPA or VRLTA related to the Disputed Fees. If you have any questions about the release, please visit www.apartmentfeesclassaction.com for additional information or consult with a lawyer. See Section 7 below for more

information regarding your options in seeking legal advice concerning the settlement.

6. Can I choose not to be in the proposed settlement?

Yes. You have the opportunity to opt out of the Settlement by submitting a written Request for Exclusion to Turnage v AION, c/o Settlement Administrator, PO Box 23668, Jacksonville, FL 32241, postmarked no later than September 8, 2026. To be valid, a Request for Exclusion must be personally signed and must include: (i) your name, address and telephone number; and (ii) a statement substantially to the effect that: "I do not want to be part of the Settlement Class in Turnage v. AION." Notwithstanding the foregoing, no person within the Settlement Class may submit a Request for Exclusion for any other person in the Settlement Class.

If you timely submit a valid Request for Exclusion, you will exclude yourself from the Settlement Class and will not be bound by further orders or judgments in the Litigation, subject to Court approval. You will preserve your ability to independently pursue, at your own expense, claims that you claim to have against the Defendants or other Released Parties. No person who has opted out of the settlement may object to any part of the Settlement Agreement.

7. Do I have a lawyer in this case?

Yes. The Court approved the following individuals to represent you and other Settlement Class Members: Kristi Kelly, Andrew Guzzo, Casey Nash, Pat McNichol and Matt Rosendahl of Kelly Guzzo, PLC at 3925 Chain Bridge Road, Suite 202, Fairfax, Virginia 22030. Telephone: (703) 424-7572.

The Court has appointed these lawyers as Class Counsel. You will not be charged for these lawyers.

8. How will the lawyers be paid? What will the Class Representatives receive?

The attorneys representing the class have handled this case on a contingency basis. To date, they have not been paid anything for their work. Class Counsel will request that the Court award attorneys' fees and expenses for the time and effort they have spent on this case. The amount that will be requested by Class Counsel will be \$388,314 and a service award for the Named Plaintiff of up to \$7,500.

Any approved attorneys' fees and expenses and the Plaintiff's service award will be paid separately by the Defendants and no Settlement Class Member will owe or pay anything directly for the attorneys' fees and expenses of Class Counsel. It will also not reduce the payment you will receive as part of the Settlement.

9. How do I tell the Court if I do not agree with the proposed settlement?

If you are a Class Member, then you can object to the proposed settlement if you do not like any part of it. You can give reasons why you think the Court should not approve it. The Court will consider your views.

To object to this Settlement Agreement, you must file your objection in writing with the Clerk of Court no later than September 8, 2026. You must also serve a copy of your objection to counsel for both Plaintiff and Defendants. The objection must include certain information outlined in the Court's Preliminary Approval Order and the Settlement Agreement which can be found on the website: www.apartmentfeesclassaction.com. If you fail to timely file and serve a written objection, you shall not be permitted to object to the approval of the settlement or Settlement Agreement and shall be foreclosed from seeking any review of the settlement or the terms of the Settlement Agreement by appeal or other means.

You will not be permitted to object to the settlement or the Settlement Agreement if you decide to exclude yourself from the settlement.

10. When and where will the Court decide whether to finally approve the proposed settlement?

The Court will hold a final approval hearing on October 21, 2026, at 10:00 a.m. before the Hon. Robert E. Payne, in the United States District Court for the Eastern District of Virginia in Richmond, Virginia.

At this hearing, the Court will consider whether the proposed settlement is fair, reasonable, and adequate. The Court will consider all timely and proper objections. You do not have to attend the hearing. The Court may also decide how much to award Class Counsel and the Plaintiff. After the hearing, the Court will decide whether to finally approve the proposed settlement.

The Court may change the date of the final approval hearing without further notice to the Class. You should check the website, www.apartmentfeesclassaction.com, after October 21, 2026, to confirm the hearing date, the court-approval process, and the Effective Date.

11. How do I get more information?

More details about the proposed Settlement, including important documents can be found at the Settlement Website www.apartmentfeesclassaction.com.