

EXHIBIT 1

TO ADDENDUM ORDER TO SEPTEMBER 29, 2014 RCO

REVISED APPENDIX FF

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

UNITED STATES OF AMERICA,)
)
)
 Plaintiff,)
)
 v.)
)
 DOUGLAS E. PAULEY, et al.,)
)
 Defendants.)
_____)

**NOTICE TO POTENTIAL VICTIMS OF ALLEGED DISCRIMINATION AGAINST
PERSONS WITH DISABILITIES AT DOUGLAS PAULEY APARTMENT COMPLEXES**

On September 29, 2014, the United States District Court for the Southern District of West Virginia entered a Consent Order resolving a housing discrimination lawsuit brought by the United States against Douglas Pauley, et al., and related apartment complex owners at thirty apartment complexes throughout West Virginia. The United States alleges that the units and many common use areas (for example, rental offices, routes to amenities, etc.) are not accessible to persons with physical disabilities. As part of the consent order, the defendants have agreed to retrofits of the units and common use areas to comply with the Fair Housing Act and the Americans with Disabilities Act at the following apartment complexes:

- a. Brook Village Apartments, Lewisburg, WV
- b. Milton Place Apartments, Point Pleasant, WV
- c. Virginia Way Apartments, Shinnston, WV
- d. Wilshere Landing Apartments, Lewisburg, WV
- e. Hudson Place Apartments, Ripley, WV
- f. Garrett Mills Apartments, Grafton, WV
- g. Elle Bella Villa Apartments, Dunbar, WV
- h. Dara Heights Apartments, Princeton, WV
- i. Tyler Heights Apartments, Cross Lanes, WV
- j. Trace Ridge Apartments, Charleston, WV
- k. Barbara Heights Apartments, Shinnston, WV
- l. Spruce Cove Apartment, Lewisburg, WV
- m. Quarry Glenn Apartments, Weston, WV
- n. Pauli Heights Apartments, Bluefield, WV

- o. Plateau Oaks Apartments, Oak Hill, WV
- p. Jenna Landing Apartments, Sissonville, WV
- q. Dylan Heights Apartments, Summerville, WV
- r. Perkins Parke Apartments, Cross Lanes, WV
- s. Van Meter Heights Apartments, Beckley, WV
- t. Deer Forest Apartments, Gassaway, WV
- u. Lynnelle Landing Apartments, Charleston, WV
- v. Cranberry Cove Apartments, Beckley, WV
- w. Mill Creek Landing Apartments, Charleston, WV
- x. Hope Landing Apartments, Mount Hope, WV
- y. Upper Falls Landing Apartments, Montgomery, WV
- z. Fort Springs Apartments, Lewisburg, WV
- aa. Pleasant Heights Apartments, Belmont, WV
- bb. Union Place Apartments, Union, WV
- cc. Hill Manor Apartments, Fayetteville, WV
- dd. Sue Terrace Apartments, Milton, WV

The Consent Order also establishes a Settlement Fund in the amount of ONE HUNDRED THOUSAND DOLLARS (\$100,000) to compensate persons who have been harmed as a result of this alleged discrimination at any of the above-named complexes. You or members of your family may be qualified to recover from the Settlement Fund if you or members of your family allege that you:

- were discouraged from living at any of the above-named complexes because of the lack of accessible features of the apartment or the complex;
- rented an apartment but were unable to use, or had difficulties using portions of your apartment or the complex because they were not accessible (including the inability to have visitors who have disabilities);
- paid to have any portion of your apartment or the complex modified to be more accessible;
- were not informed about, or offered, all available apartment units because of your disability or the disability of someone who would be living with you; or
- requested and were denied a reasonable accommodation for your disability or the disability of someone who was living with you.

If you believe you have been harmed because of your disability at any of the above-named apartment complexes, or if you have information about someone else who may have been harmed, please contact the United States Department of Justice at: 1-800-896-7743, ext. 9993.

You also may write to United States Department of Justice, Civil Rights Division, Housing and Civil Enforcement Section, 950 Pennsylvania Avenue, N.W. – G St., Washington, DC, 20530, Att: DJ 175-84-45

***** You must call or write no later than 365 days from the date of entry of the Consent Order] to be eligible for compensation, and your telephone message or letter must include your name, address, and, if possible, at least two telephone numbers where you may be reached.**

You do not have to participate in this settlement fund established by this Consent Order. Under the Fair Housing Act, complaints concerning discrimination against individuals at multifamily apartment complexes, such as the ones listed above, may be pursued through private legal action initiated by an individual. You may find your state bar association helpful in locating an attorney to discuss your legal rights. Information about the West Virginia State Bar Lawyer Referral Service is available at <http://www.wvlawyerreferral.org>. Any decision by you to decline to participate in the settlement fund does not affect any rights you might otherwise have to pursue a private action under the Fair Housing Act.