

Legal Notice

IN THE CIRCUIT COURT OF THE TENTH JUDICIAL CIRCUIT  
OF THE STATE OF FLORIDA, IN AND FOR POLK COUNTY  
CIVIL DIVISION

**Do you currently or did you previously own a home in TerraLargo and paid a Club Membership Fee under the Club Plan?**

***You Could Get Money from a Settlement.***

**THIS NOTICE MAY AFFECT YOUR LEGAL RIGHTS. PLEASE READ CAREFULLY.**

Records show you could be affected by a Settlement in a class action lawsuit, *Pena, Jr. v. OK TerraLargo, LLC, et al.*, No. 2020-CA-002588, in the Circuit Court of the Tenth Judicial Circuit of the State of Florida. Judge Keith P. Spoto is overseeing this lawsuit.

Raymond Pena, Jr. (the “Plaintiff” or “Class Representative”), the individual bringing this lawsuit, alleges that the Defendants, OK Terralargo, LLC; OK Terralargo Club, LLC; OK JV2 LLC; OK JV2 Holdings LLC; KC 9W57th 2 LLC; KLP Management, LLC; Robert Julien, individually; and James Harvey, individually (“Defendants”), violated Florida Statutes by requiring TerraLargo homeowners to pay Club Membership Fees. Defendants deny these claims and allegations and have asserted defenses.

The Court did not decide in favor of the Plaintiff or Defendants. Instead, Defendants agreed to settle to resolve the claims against them in this lawsuit. The proposed Settlement does not mean that Defendants did anything wrong.

You may have seen a previous notice about the Court certifying the class in this case. This Notice is about the proposed Settlement with Defendants. The purpose of this Notice is to inform you about the proposed Settlement, and your rights and options, before the Court decides whether to approve the Settlement.

You are included in the Settlement Class if you are a person who currently owns, or previously owned, a home in TerraLargo from August 19, 2016, through July 15, 2021, and have paid a Club Membership Fee under the Club Plan.

The deadline to opt out of the Settlement Class has passed. If you did not opt out of the Settlement Class, you gave up the right to sue Defendants on your own for the claims in this lawsuit, you are bound by the Court’s decisions, and you may get a payment from the Settlement if it is approved.

This Notice is only a summary. More detail is provided in the Settlement Agreement, available at [www.TerraLargoClassAction.com](http://www.TerraLargoClassAction.com). The Settlement Agreement describes the specific claims you will give up (or “release”) if it is approved, so read it carefully.

**SETTLEMENT BENEFITS**

To settle the claims in this lawsuit, Defendants will pay \$650,000 into a common fund. This amount will be used to pay class administration costs, an incentive award to the Class Representative if approved by the Court, and money to eligible Settlement Class Members. Defendants also agreed to separately pay \$1,150,000 for attorneys’ fees and costs.

## GET A PAYMENT

If you are a Settlement Class Member, you will get an automatic payment based on the amount you paid in Club Membership Fees, the number of eligible Settlement Class Members, and the total amount of money available from the common fund (after paying class administration costs and the incentive award). Payment amounts will be adjusted proportionally to ensure that all eligible Settlement Class Members receive a payment. Settlement Class Members will receive their payments after the Court grants final approval to the Settlement.

Please notify the Class Administrator of any corrections or changes in your name or address at [info@TerraLargoClassAction.com](mailto:info@TerraLargoClassAction.com) or TerraLargo Class Action, c/o A.B. Data, Ltd., P.O. Box 173121, Milwaukee, WI 53217.

## THE LAWYERS REPRESENTING YOU

The Court has appointed attorneys, J. Daniel Clark of Clark & Martino, P.A., J. Carter Anderson of Bush Ross, P.A., and John Marc Tamayo of Campbell Trohn Tamayo & Aranda, as “Class Counsel” to represent you and the other Settlement Class Members in this lawsuit.

If you wish to communicate with Class Counsel, you may do so by contacting lead Class Counsel:

J. Daniel Clark, Esquire  
3407 W. Kennedy Blvd.  
Tampa, FL 33609  
1-813-879-0700

You will not be charged for these lawyers. If you want to be represented by another lawyer, you may hire one to appear in Court for you at your own expense.

## OBJECTING TO THE SETTLEMENT

As a Settlement Class Member, you can object to any part of the proposed Settlement. The Court will consider your views.

To object, you must send a letter stating that you object to the proposed Settlement in *Pena, Jr. v. OK TerraLargo, LLC, et al.*, No. 2020-CA-002588. Your written objection must include:

1. The name of the case and case number;
2. The name, address, telephone number, and signature of the Settlement Class Member filing the objection;
3. The address of the property or properties owned in the TerraLargo community;
4. The specific reasons why the Settlement Class Member objects to the proposed settlement;
5. The name, address, bar number, and telephone number of the objecting Settlement Class Member’s counsel, if represented by an attorney. If the Settlement Class Member is represented by an attorney, he or she must comply with all applicable rules of the Court; and
6. Whether the objecting Settlement Class Member intends to appear at the Fairness Hearing, either in person or through counsel.

You must send your objection through the Court’s electronic filing system and by mail and email to the Court appointed Class Administrator, A.B. Data, Ltd., P.O. Box 173121, Milwaukee, WI 53217 so that your objection is received (and filed) by **June 8, 2026**:

<b>Court</b>	<b>Class Administrator</b>
Polk County Clerk of the Circuit Court P.O. Box 9000 CC-XX Bartow, FL 33831-9000	A.B. Data, Ltd. P.O. Box 173121 Milwaukee, WI 53217 Email: <a href="mailto:info@TerraLargoClassAction.com">info@TerraLargoClassAction.com</a>

If you object, you may also appear at the final approval hearing, either in person or through your own lawyer, at your own expense. If you appear through your own lawyer, you are responsible for paying that lawyer.

You (and your attorney or authorized representative, if you have one) are only allowed to submit an objection for you as an individual Settlement Class Member. Settlement Class Members cannot object as a group, class, or subclass.

### **FAIRNESS HEARING**

The Court will hold a Fairness Hearing on **June 18, 2026, at 3:45 p.m.** at Polk County Courthouse, 225 North Broadway Avenue, Bartow, Florida 33830, in Hearing Room 5A-2 (Fifth Floor, Red Elevators) or via the Court's Microsoft Teams platform. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check [www.TerraLargoClassAction.com](http://www.TerraLargoClassAction.com) for updates.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them and may listen to people who have asked to speak at the hearing. The Court may also decide whether to approve the attorneys' fees and costs and an incentive award to the class representative. After the hearing, the Court will decide whether to approve the Settlement.

### **ADDITIONAL INFORMATION**

More details and the Settlement Agreement are available at [www.TerraLargoClassAction.com](http://www.TerraLargoClassAction.com). If you have questions, please contact the Class Administrator:

**A.B. Data, Ltd.**  
**Court Appointed Class Administrator**  
**P.O. Box 173121**  
**Milwaukee, WI 53217**

**Website: [www.TerraLargoClassAction.com](http://www.TerraLargoClassAction.com)**  
**Email: [info@TerraLargoClassAction.com](mailto:info@TerraLargoClassAction.com)**  
**Toll-Free Telephone: 877-388-1755**

The filings and other records in this lawsuit may be examined and copied at any time during regular business hours at the Office of the Clerk: Polk County Clerk of Circuit Court, 225 North Broadway Avenue, Bartow, FL 33830. **Please do not contact the Court or the Circuit Clerk's Office about the information contained in this Notice.**

Dated: April 27, 2026