



OFFICE OF THE ATTORNEY GENERAL
CONNECTICUT

WILLIAM TONG
ATTORNEY GENERAL

February 6, 2026

By Email

Brian J. Wheelin, Esq.
Robinson & Cole, LLP
9th Floor
Stamford, Connecticut 06901
bwheelin@rc.com

Re: Century Hills Property Owner LLC *d/b/a* Concierge Apartments,
Rocky Hill, Connecticut (“Concierge”)

Dear Mr. Wheelin:

I am in receipt of your response dated February 5, 2026.

Your response is worse than tone deaf, it is callous. In this extreme cold – projected to be -2 and -3 degrees, respectively, tomorrow and Sunday – your response could at best be characterized as indifferent.

Whether your client spent \$22 million in the past or expects to spend \$2 million now proves only one thing — Concierge Apartments has clearly not done enough to keep these residents safe and honor its legal and ethical obligations to them and their families. No doubt Concierge has put a price on their safety and whatever that price is, it is wholly inadequate.

As you know, Concierge has been the subject of multiple code enforcement actions over the years. Three documented deaths at the Concierge property have occurred in the past year. The most recent person to die was tragically found in Concierge’s poorly plowed parking lot the day after a winter storm. According to local reporting, last winter there was also a loss of hot water. Residents have complained that Concierge fails to keep the property clean, well lit, consistently heated, leak-free, plowed and accessible, routinely putting resident safety at risk. Residents also indicate that appliances and elevators are routinely broken, that their work orders are consistently ignored and ultimately closed out without action or only a temporary fix.

The crisis Concierge now finds itself in was predictable and avoidable.

Yesterday the Town of Rocky Hill was forced to issue an evacuation order for two buildings as the town determined them to be unsafe for occupancy. Today the town extended the order to the entire

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complex. Contrary to your statement that lodging has been offered to all impacted tenants, the Office of the Attorney General last evening heard from a resident who had to leave his unit by midnight by the town's order but had not received a response from Concierge on a hotel accommodation, other than that the management office denied his request to book the hotel and seek reimbursement.

At a minimum, the State of Connecticut demands the following:

- One month's rent credit utterly fails to compensate for Concierge's failures presently harming tenants, and for the many years leading up to this catastrophe. Tenants should be credited their rent for an extended period due to Concierge's failure, such as for next year if they choose to stay.
- Tenants should be reimbursed immediately for out-of-pocket costs like lost time at work, alternative childcare and housing arrangements, lost food, medication and utilities.

To be clear, these costs must be paid by Concierge – not the Town of Rocky Hill.

Furthermore, your statement about relying on tenants' individual renter insurance policies would be laughable if not so cruel in blaming the victims. Concierge's tenants are not a backstop for its failures. I hope Concierge has its own insurance policy to cover these types of disasters. That's not the tenant's problem, that's your client's problem.

It is unconscionable to demand that tenants, who are mostly working people now struggling to put a roof over their heads during the coldest stretch in recent memory, honor their contractual obligations to a Los Angeles-based real estate empire that boasts \$15 billion in real estate assets under management in 23 states. This is particularly appalling when Concierge itself is likely in breach of its legal and contractual obligations.

I am hard pressed to believe that a Connecticut court would see it any other way – and I anticipate that a Connecticut court would strongly consider these contracts to be voidable.

This catastrophe has made Concierge, and its shadowy web of ownership interests, the poster child for everything that is wrong with private equity and financial investor who utterly fail the people that they serve.

Brian Wheelin, Esq.
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Do better. Now. If I do not see significant progress over the weekend, you will be hearing from my Office on Monday.

Very truly yours,

A handwritten signature in blue ink, appearing to read "william tong".

WILLIAM TONG