

# **MOBILE MANUFACTURED HOME ADVISORY COUNCIL**

## **MINUTES**

**JUNE 17, 2020**

The Mobile Manufactured Home Advisory Council convened via ZOOM webinar on Wednesday, June 17, 2020 at 10:00 AM.

Members Present:	Bennett Pudlin Mark Berkowitz Joseph B. Castonguay Myriam Clarkson	Attorney at Law, Acting Chairperson Mobile Home Park Owner CT Real Estate Commission Member Mobile Manufactured Home Industry Representative
Jennifer Ponte	Al Hricz Department of Housing Colette Slover  Marcia L. Stemm Dave Delohery	Senior Citizen  CT. Housing Finance Authority Representative Mobile Home Park Owner Mobile Home Park Tenant or Representative of Such Tenant
Members Absent:	Leonard Campbell Arthur Mazeau	Town Planner Mobile Home Park Tenant or Representative of Such Tenant
Member Vacancies:	Banking Industry Representative Mobile Home Park Tenant or Representative of Such Tenant Mobile Home Park Owner	
DCP Council Staff:	Robert M Kuzmich, R.A. Paulette Annon, Staff Attorney Pamela Brown, Director, Investigations Division	License & Applications Specialist
Others Present:	Nancy Palmisano, Connecticut Manufactured Housing Association Raphael Podolsky, Connecticut Legal Services Valencia Taft Jackson, CT. Housing Finance Authority	

Note: The administrative functions of the Boards, Commissions and Councils are carried out by the Department of Consumer Protection, Occupational and Professional Licensing Division, Richard M. Hurlburt, Director. For more information, refer to:

DCP Agency website: [www.ct.gov/dcp](http://www.ct.gov/dcp) Division E-Mail: [dcp.occupationalprofessional@ct.gov](mailto:dcp.occupationalprofessional@ct.gov)

### **MINUTES OF PREVIOUS MEETING:**

1. Review of the March 10, 2020 Mobile Manufactured Home Advisory Council meeting draft minutes.

The Council voted, unanimously, to approve the minutes as written. (Hricz/Stemm)

### **COMMENTS OR CONCERNS OF ANY PERSON PRESENT TODAY:**

There were no comments or concerns discussed.

### **REPORT FROM SUB-COMMITTEES:**

#### **LEGISLATIVE COMMITTEE:**

1. The Council continued the discussion regarding revision to DCP enforcement powers and related proposed statutory changes. Mr. Pudlin reminded the Council that the Department had submitted a Bill regarding inspections as they relate to licensing. The council was concerned that the Bill as it appeared was very different than what was previously discussed. He noted the legislature was scheduled to hold a special session (in light of the current pandemic) and asked for any updates as to what they might address.

Ms. Annon noted that she was not able to comment on this matter and that Julianne Avallone or Leslie O'Brien would be the people to ask. Mr. Podolsky stated that he doubted the special legislative session would be addressing any Council issues. He also noted that this session is not definite at the moment. Mr. Pudlin stated that the last time he spoke with Leslie O'Brien, she noted that she did not expect the Council's legislation to move forward but if that changed, she would keep him updated. He will reconfirm this with Ms. O'Brien and keep the Council updated.

As an aside, Mr. Pudlin advised the Council that he received an e-mail from Ms. Avallone regarding the current license status of two particular mobile home parks. He also inquired as to the status of a pending case before the Department to which Ms. Annon noted that the matter is still pending and unchanged at the moment. A final decision has not yet been issued by the Department. Ms. Annon noted that the Department has the discretion to push back any dates as to when Final Decision Order are issued. Ms. Annon also addressed foreclosure proceeding noting that none are going forward at the moment.

#### **FINANCE COMMITTEE:**

1. Rescheduled meeting with CHFA about financing of homes and parks.

Mr. Pudlin stated that the Finance Committee meeting, originally scheduled for this past spring, was not held due to the COVID crisis and has been tentatively rescheduled for late July 2020. Mr. Pudlin commented on a new purchase program for individuals and parks. He noted that the Council believes these programs need to be revisited taking into account to the both the Council and the CHFA's viewpoint and also in light of Federal obligations.

Ms. Slover noted that the focus of the upcoming meeting will be on the park purchase program although Mr. Pudlin stated that he thought it was agreed that the discussion will begin on a higher level discussion to include a broader mutual understanding of the circumstances surrounding the purchase of homes and parks. Ms. Slover recommends that Ms. Taft Jackson be included in tis upcoming Finance Committee Meeting. It was stressed that all sides of the conversation need to be at this meeting. Mr. Hricz also recommended some additional organization representatives be present at the meeting.

Mr. Delohery commented on the sale of mobile homes where the loans are sold in the secondary markets. He also noted in neighboring states, buyouts of mobile home parks involve quasi-public organizations.

Ms. Taft Jackson noted that the CHFA is actively pursuing revisiting their mobile home program to provide a user-friendly product available to new home buyers. One problem that they have encountered is that they are not originators. In addition, they have had conversations with various HFA's around the country involved in mobile home programs in the hopes of gaining new information for possible incorporation into their program. Ms. Taft Jackson answered questions from Mr. Delohery regarding approved lenders by CHFA.

The Council asked Ms. Palmisano if she can poll park residents for any information they can provide on lending institutions for mobile home purchases. She agreed to will try and have this information available to the CHFA before the Finance Committee meeting.

## **EDUCATION COMMITTEE:**

### 1. Discussion of revisions to Disclosure Statement

Mr. Pudlin advised the Council that report was to have been presented by Ms. Clarkson and Ms. Stemm. Given the current pandemic, that did not happen. There is a meeting set for early July 2020 with the goal of establishing an outline of issues for the Council to discuss at their September 2020 meeting. Mr. Pudlin reviewed the history of the Disclosure Statement for the at the request of Ms. Stemm.

## **OLD BUSINESS:**

1. Status of Country Mobile Estates and Oakridge Gardens Mobile Home Park complaints pending with DCP Legal Division and status of licenses.

Ms. Brown updated the Board at their request relative to Country Mobile and Oakridge Parks and answered questions from Mr. Pudlin. She noted the interactions of these complaints with the Department's Legal Division and deferred many of the questions asked by the Council to them.

2. DCP proposed legislation affecting mobile homes.

Discussed under "LEGISLATIVE COMMITTEE" above.

### **NEW BUSINESS:**

1. Mr. Hricz stated that he was not able to visit a Mobile Home Park in Orange, Connecticut regarding the status of the park due to the COVID crisis. Mr. Pudlin asked both Mr. Delohery and Mr. Hricz if they can visit the park to ensure that the remaining residents are aware of their rights under the statutes. They both agreed to try and make a visit to this park.

### **CORRESPONDENCE:**

None received.

### **DCP COMPLAINT AND INSPECTION REPORTS:**

1. Discussion with Pamela Brown on recent inspections and license renewals.

Ms. Pamela Brown noted that since March 26, 2020 her Division began telecommuting. Since that time, they have not done any physical park inspections and have received one complaint in April which was referred to the Legal Division. Further, they have received no new park applications or license transfers.

Mr. Podolsky noted his concern regarding complaint matters involving a receiver and the need for the Department to begin follow-up inspections as required and transmit any new information to the receiver and perhaps the Court. Mr. Pudlin agrees with Mr. Podolsky that the Department should make this action a priority.

As an aside, Mr. Delohery asked Ms. Annon to provide website links regarding the complete record of the receivership case involving County Mobile Estates.

2. Review of current complaint report including open, closed, and dismissed cases.

Ms. Brown noted that Department protocol in recognition of the current pandemic/emergency declaration will be changing on a case by case basis as determined essential by Ms. Brown. The Department will be going out on complaints. She noted the use of the new mobile inspection application module and gave the Council a general overview of how her Division is

currently operating relative to inspections and the approximately 190 complaints received. Ms. Brown noted that her Division assists the Legal Division, at their request from time to time, by doing specific case related inspections. In general, Ms. Brown noted that her Division has not come to a complete halt.

### 3. Review of current inspection report and inspection schedule

She noted no new complaints received since the Council's March 2020 meeting. With the change of seasons, she finds that many of the mobile home parks are now completing many site improvements that had been on hold due to weather. She noted various examples of these issues. She also gave the Council a more detailed overview of the Department's new mobile inspection application. The application is used by phone and has the ability to take photographs and integrate the same with the inspection report. This report can then be sent electronically to the involved parties.

Mr. Delohery asked the Council about an item from the previous minutes regarding mobile home parks that have gone out of business but are still operating. Mr. Pudlin explained that he and Ms. Palmisano had done a cross walk almost two years ago through parks that had gone out of business on the record via change of ownership or otherwise but were still operating. They passed their findings on to the Department for further investigation. Ms. Brown addressed this matter in general terms noting that an investigator had gone out to some parks on this issue. She noted that a problem the Department has is that the licensing database only tracks mobile home parks by name and not address. It was noted that this database issue is under discussion with the Department. Mr. Pudlin elaborated more on this issue with Mr. Castonguay. This discussion will be continued at the Council's next meeting in September.

Mr. Delohery noted an issue regarding telephone calls he received this past spring concerning tenants getting sand in their water system at Oakridge Park. He has personally been on site and confirmed this issue and asked the Department to please investigate this matter. Mr. Delohery will file a complaint with the Department at the request of Ms. Brown. Mr. Pudlin, on behalf of the Council, also encouraged Mr. Delohery to file the complaint.

### 4. Status of Council review of problematic leases

Ms. Brown noted that there may be a matter pending with the Department in this area which possibly will require Mr. Pudlin's and the Council's assistance. Mr. Pudlin noted that both he and the Council will assist the Department in any way they can. Ms. Brown thanked the Council.

### **COMMENTS OR CONCERNS OF ANY PERSON PRESENT TODAY:**

There were no further comments or concerns discussed.

There being no further business, the meeting adjourned at 11:36 AM.

Respectfully Submitted,

Robert M. Kuzmich, R.A.  
License and Applications Specialist

2020 MEETING SCHEDULE:

- September 16
- December 16

All meetings will take place at 450 Columbus Boulevard, Hartford, CT at 10:00 AM  
unless otherwise noted.