



City of
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Office of the City Attorney

Andrew Janz
City Attorney

September 26, 2025

VIA E-MAIL

Country West Partnership, LP
Attn: Brenda Aguilar
BLTAguilar@aol.com

Leonda Johnson, Residents' Committee
Chair
leondad@gmail.com

Vicky DuRand, Manager
countrylivingmhp@att.net

**RE: Hearing on Country Living Mobile Home Park's 2025 Rent Increase Application;
Supplemental Documentation Requested in Anticipation of Hearing**

Hearing Details

The Mobilehome Park Rent Review and Stabilization Commission (Commission) will hold a hearing on Country Living Mobile Home Park's 2025 rent increase application (Application) on **Tuesday, October 14, 2025 at 6:00 pm**, in Council Chambers of City Hall, 2nd Floor, 2600 Fresno Street, Fresno, CA 93721.

At this hearing, the Commission will review the Application for completeness and compliance with the requirements of the Fresno Municipal Code (FMC), and will determine a "fair, just, and reasonable" rent increase based on the FMC Section 12-2012 factors asserted as relevant by the Owner in the Application and the provided supporting documentation.

Pursuant to Commission Bylaws Article 4, Section 13 and City Council Rules of Procedure No. 16(c), both Park Owner and Park Residents' Committee (or an appointed representative) will have an opportunity to address the Commission for a 10-minute presentation during the hearing. Copies of the Commission Bylaws and City Council Rules of Procedure are available online for further details on hearing procedure, or you can email me at sarah.papazian@fresno.gov to request a copy.

Council Chambers are equipped with large-scale video screens, which can be used to display any visual aids you wish to use during your presentation. If you wish to use the screens, you will need to email a copy of your visual aids to me in advance, as a single document in either .ppt or .pdf form.

Supplemental Documentation

After reviewing the current documents submitted, below is what I would request you each submit to me by end-of-business-day next Friday, October 3. There is absolutely no requirement that you do so at all, or that what you submit contains every aspect of what I request or only what I request. There is also no guarantee that submitting everything I've requested below will result in the Commission finding in your favor.

As discussed previously, the Commission can only make a decision based on the information conveyed to them, and failure to submit concise and contextualized supporting documentation for each argument or factor may affect the Commission's final decision. My goal is to identify as many missing elements likely to affect the Commission's analysis as possible, and give both parties the opportunity to provide them.

The main thing needed by both Park Owner/Management and Residents' Committee is a memo explaining your positions and arguments, and responses to what you believe the other party's position is. I've attached previous memos for you to get an idea of what I'm talking about. The two most important things these memos do are (1) use headings and subheadings to clearly organize their arguments; and (2) support their arguments with evidence (either referencing laws or pages of the Rent Increase Application, or referencing outside sources which they attached as exhibits). NOTE: I did not include the attached exhibits from these memos due to file size, but they are all part of the items I sent links to last week.

Specific Requests for Park Owner/Management's Memo:

- In your Form MRR 1-2, you checked that your increase is based on the capital improvement factor. Your July 25, 2025, letter to the City (also included in your Application) states that the road is significantly deteriorated as it hasn't been replaced for at minimum 30 years. FMC section [12-2012\(h\)](#) excludes repairs for ordinary wear and tear from the factors to be considered. Please explain how the repaving of the road is not a repair from ordinary wear and tear. Consider including the source(s) of any definitions or professional analyses you're basing your assessment on as an exhibit(s).
- The letter to the Residents' Committee indicates the loan amount is \$680,932, with \$17,834 in title fees. The loan document indicates a loan of \$950,000 and title fees of \$14,018 (these may be wrong, as the document is degraded and difficult to read). Please explain these numbers.
 - What is the unaccounted-for \$269,068 (\$950,000 - \$680,932) of the loan principal for?
 - Where is your calculation of \$17,834 in title fees coming from, if the document says \$14,018? Is the whole total of title fees being assigned to the repavement, if approximately 40% of the loan principal is not going to the repavement?
- Please explain the necessity of the loan for the repavement. What is the current profit/loss at the park? How much rent is being taken in each month, and what portion is dedicated to regular upkeep of the property each month? What overhead does the park have each month that would prevent it from absorbing the cost of the repaving, either in part or in full, without the loan.
- Please explain all instances of your compliance (or attempts to comply) with the procedures of FMC sections [12-2009](#) and [12-2010](#) (the meet and confer procedure/collaborating with the Residents' Committee to find a mutually acceptable increase amount).

Specific Requests for Residents' Committee Memo:

- Please explain why you believe Park Owner's requested increase amount is not merited. I know this is a very broad statement, but the Residents' Committee can only respond to the Application as produced by the Park Owner, I don't have any documentation to follow your Committee's thought process. How were the "fair, just, and reasonable" factors from FMC section [12-2012](#) included in your analysis (both the one identified by Park Owner, and those you feel should be considered)? What other things did you look to when considering the Application – other parks, statistics, definitions, etc.?

- Please explain all instances of your compliance (or attempts to comply) with the procedures of FMC sections [12-2009](#) and [12-2010](#) (the meet and confer procedure/collaborating with the Park Owner (or their Management) to find a mutually acceptable increase amount).

Both Park Owner/Management and Residents' Committee have until **5:00 pm on October 3, 2025**, to submit the requested memos, and any other testimony, documents, written declarations, or other relevant evidence they wish to be considered by the Commission. Everything must be submitted to both the City and the opposing party.

The City will accept service of the aforementioned relevant evidence via email sent to me at sarah.papazian@fresno.gov.

Please contact me with any questions or concerns you may have.

Sincerely,



Sarah Papazian
Senior Deputy City Attorney

Enclosed: Notice of Public Hearing dated September 26, 2025

SAP:th