

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF MACOMB

MICHIGAN MANUFACTURED HOUSING ASSOCIATION,

Plaintiff,

Case No. 25-004477-CZ

Hon. Richard L Caretti

CITY OF WARREN, KIRK REHN, in his  
official capacity as Director of Building and  
safety Engineering, and JOHN  
IMPELLIZZERI, in his official capacity as  
Building Inspector,

Defendants.

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There is no other pending or resolved civil action arising from the  
transaction or occurrence alleged in this Complaint in this Court or  
any other Court of the United States.

COMPLAINT FOR DECLARATORY RELIEF INJUNCTIVE RELIEF AND WRIT OF  
MANDAMUS

Plaintiff Michigan Manufactured Housing Association (the "Association"), through its counsel  
Dykema Gossett PLLC, files this Complaint against Defendants City of Warren (the

"City"), Kirk Rehn, in his official capacity as City of Warren Director of Building and Safety Engineering, and John Impellizzeri, in his official capacity as City of Warren Building Inspector, and, in support, states as follows

### NATURE OF ACTION

1. In 1961, the Michigan Supreme Court upheld a writ of mandamus requiring the City of Warren to issue permits allowing mobile home and trailer parks to receive water, sewer, and electrical services. See *Knibbe v Warren*, 363 Mich 283 (1961). As the Court wrote then, it was "apparent that the defendant city desires to and has made every effort at dissuading or flatly prohibiting mobile home courts or trailer parks" through "arbitrary and capricious" action and an unreasonable "exercise of the police power" that was "not predicated upon a substantial tendency to promote the public health, safety, morals, or welfare of the people." *Id.* at 285.

2. Nearly 65 years later, what's old is new again. Despite extreme shortages of affordable housing, the City of Warren is once more "dissuading or flatly prohibiting" manufactured housing developments through a series of targeted efforts that run contrary to Michigan law and the City's authority.

w. 201 Townsend Street

3. Among other examples, the City is denying (or constructively denying by failing to rule on) permit applications for the construction of new manufactured houses that meet all applicable requirements. It is placing arbitrary and unlawful requirements on the construction of new manufactured houses or improvements to existing manufactured houses, effectively barring new constructions or renovations. It is unlawfully "red tagging" resident-owned-and-occupied structures, which has resulted in the displacement and/or homelessness of residents. It is failing to follow procedural requisites when red tagging unoccupied or community-owned manufactured houses. It is conducting constant, unlawful

inspections within manufactured housing communities. And it is routinely misinterpreting or misapplying Michigan law and the City's own ordinances when doing so.

4. The City's actions have already forced at least one manufactured housing development in the City out of business. If allowed to continue, others will soon follow.

5. This conduct affects not only the owners of manufactured housing communities, but it ultimately disproportionately harms low-income residents who rely on manufactured housing as their only path to homeownership. In Landmark Estates, for example, a single mother of three, came home to find her home condemned by the City without any notice, and as a result was displaced and homeless with her children for months. Residents have repeatedly expressed that their greatest fear is losing their homes—not because they are unsafe, but because of the City's unlawful practices that are designed to drive them out.

6. These actions are not isolated mistakes. Rather, they reflect a pattern and practice of hostility toward manufactured housing communities and their residents. And the result is a de facto policy of exclusion: by denying permits, imposing unlawful setback requirements and red tagging occupied homes without due process, the City has made it nearly impossible for manufactured housing communities to continue operating. This has stripped community owners of lawful property rights, exacerbated an already dire housing shortage, and displaced vulnerable residents — all in violation of state law, the City's own ordinances, and constitutional protections.

#### PARTIES JURISDICTION AND VENUE

7. Plaintiff Michigan Manufactured Housing Association ("MMHA" or the "Association") is a Michigan nonprofit trade association representing the mobile and modular home industries with its principal place of business in Okemos, Michigan.

8. The Association has a membership of approximately 700 home retailers, suppliers, community owners, installers, service companies, financial institutions, and builders/manufacturers. These members include numerous manufactured housing communities

located in the City of Warren, including Landmark Estates, Twin Pines, and Motor City Mobile Home Park. In addition to these still-operating communities, the Association's members previously included Continental Mobile Village Mobile Home Park and Woodview Mobile Village Mobile Home Park, who were forced to shut down due to the City's actions.

9. As set forth below, the Association's members are directly and adversely affected by the City's unlawful actions and would have standing as individual plaintiffs, meaning the Association itself has organizational standing. See *Mich Citizens for Water Conservation v Nestle Waters N American Inc*, 479 Mich 280, 296; 737 NW2d 447 (2007), overruled on other grounds by *Lansing Sch Ed Ass'n v Lansing Bd of Ed*, 487 Mich 349; 792 NW2d 686 (2010).

10. Defendant City of Warren (the "City") is a Michigan municipal corporation organized under the laws of the State of Michigan, located in Macomb County, Michigan.

11. Defendant John Impellizzeri is the City Inspector, responsible for conducting inspections at the Association's communities.

12. Defendant Kirk Rehn is the City's Director of Building and Safety Engineering, responsible for reviewing and issuing permits.

13. This Court has subject matter jurisdiction under Const 1963, art 6, SS 13 and MCL 600.605, which vests the circuit court with original jurisdiction in all civil matters not otherwise excepted.

14. Venue is proper in this Court under MCL 600.1615.

#### FACTUAL BACKGROUND

15. Manufactured housing is one of the last remaining sources of unsubsidized affordable housing in Michigan. Communities in Warren such as Landmark Estates, Twin Pines, and Motor City provide safe, attainable housing for hundreds of residents, including veterans, retirees, single parents, and families on fixed incomes.

16. The Association represents community owners across the state, including members who operate manufactured housing communities in Warren. These members are directly and adversely affected by the City's unlawful conduct described herein.

17. As set forth below, in recent years, the City of Warren has undertaken a systemic course of action designed to obstruct the operation, rehabilitation, and improvement of manufactured housing communities within its borders.

### Landmark Estates and Twin Pines

18. Landmark Estates and Twin Pines are owned and operated by Warren MH Holdings LLC ("Warren MH"). Landmark is located at 21908 Dequindre Road, and Twin Pines is located at 6815 E. 11 Mile Road.

19. Since acquiring these communities in 2024, Warren MH has invested over \$500,000 in structural and cosmetic improvements, including utility infrastructure improvements, asphalt and concrete repairs and replacements, demolitions of homes that are no longer suitable, tree trimmings and removals, repairs, and general property clean up. See Affidavit of Brenton Chandler ("Chandler Aff."), 3, Ex. A.

20. In addition, Warren MH has plans to make \$675,000 in additional investments, including approximately \$300,000 that it has earmarked in escrow to bring in 15 additional mobile homes and expand the supply of affordable housing in the City. Id 4.

21. There is significant demand for housing in Warren MH's communities. As of August 2025, there was a waitlist of 50 people seeking housing in Warren MH's communities.

22. The City's actions have made that impossible. Due to the City's arbitrary, unlawful, and discriminatory actions described below, Warren MH has been unable to move a single new tenant into its communities over the past year; it has been unable to add new housing to its communities; and it has been unable to renovate and improve the existing housing in its communities. Id. 6.

## Unlawful and Harassing Inspections

23. The Mobile Home Commission Act ("MHCA" or "Act") allows local governments to enact ordinances "to inspect mobile homes for safety" within a mobile home park if the mobile home being inspected is being rented to a tenant by the owner of the mobile home . . .

A local government may inspect mobile homes rented to tenants by the owner for safety if the safety inspection ordinance applies to all other rental housing within the local "government unit." MCL 125.2307(7).

24. The Act further provides that "[i]f a local government inspects mobile homes rented to tenants by the owner for safety, the period between inspections shall not be less than 3 years unless the local government is responding to a complaint from a tenant." Id.

25. Local governments cannot "propose a standard related to mobile home parks . . . or related to mobile homes located within a mobile home park, that is higher than the standard provided in [the MHCA] or the code" unless they "file the proposed standard with the commission" and obtain approval of that standard. MCL 125.2307(1).

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1 An "inspection for safety" is defined as "an inspection of a rental mobile home that is limited to ensuring the proper functioning, or protection, of the following: (a) Furnace. (b) Water heater. (c) Electrical wiring. (d) Proper sanitation and plumbing. (e) Ventilation. (f) Heating equipment. (g) Structural integrity. (h) Smoke alarms." MCL 125.2307(7).

26. In violation of MCL 125.2307(7), the City, through its Building Inspector John Impellizzeri, has repeatedly inspected homes that are owned by the occupants, and that are not "being rented to a tenant by the owner of the mobile home." Chandler Aff. 8.

27. Also in violation of MCL 125.2307(7), the City, through Mr. Impellizzeri, is engaged in a practice of continuous monitoring and inspections of rented mobile homes.

28. Rather than inspecting homes "for safety" with "not less than 3 years' ,between inspections, City inspectors drive through the Warren MH communities on a weekly (and, al times, twice-daily) basis to monitor and inspect homes. Id. Il 9.

29. These repeated inspections are not related to any public health, safety, or welfare igitan purpose, and are not conducted in response to tenant complaints. Id.

30. Instead, they are designed to harass Warren MH and its residents, and to identify igitan any reason to issue "red tags" (described below) and force residents out of their homes.

31. In addition, the City of Warren's Code of Ordinances (the "City Code") provide igitan that "[a]n authorized city official shall not enter a dwelling without permission of the owner or igitan occupant, unless a warrant has been obtained, or there is imminent danger to life, or otherwise igitan permitted by law," City Code 20-16

32. City inspectors have entered unoccupied homes within the Warren MH Communities without seeking any approval to do so, and without contacting Warren MH before doing so. Chandler Aff. 10.

33. Warren MH has repeatedly made the City aware of these violations, yet the City continues to patrol and inspect the properties without any basis in law allowing it do so.

### Unlawful Redtagging

34. Under the City Code, the City may designate a building as "manifestly unsafe for the purpose for which it is used." City Code, 9-165(6). But when doing so, the City must follow the procedures set forth in the City Code.

35. First, the City must "issue a written notice of dangerous building, structure, or premise to the owner, occupant, or other party in interest," and this notice must "include the date of inspection, the name of the inspection, the name of the inspector, the condition of the building, structure or premises, the repairs necessary to abate the nuisance and the time within which the nuisance shall be abated." Id. 9-168(a).

36. This notice "shall specify the time and place of hearing to determine whether the building, structure or premise is dangerous within the definition of section 9-165 or section 9-166" and the "person to whom notice is directed shall have the opportunity to show cause at the hearing why the hearing officer should not order the building or structure demolished, made safe or the premise properly maintained." Id. 9-168(c). "The notice shall be served at least ten (10) days before the date of the hearing specified in the notice." Id. And the "hearing officer shall be appointed by the mayor . . . A present employee of the city shall not be appointed as hearing officer." Id. 9-169. A detailed hearing and appeal process is set forth in the City Code. Id. 9-170 to 9-175.

37. The City has repeatedly violated these Code provisions. Residents have reported that Mr. Impellizzeri has walked the premises and automatically tagged homes that he thinks are unoccupied without following any inspection process whatsoever. Chandler Aff. 12.

38. In violation of the City Code, these red tags fail to specify the "condition of the building" that presents a nuisance and the "repairs necessary to abate the nuisance and the time within which the nuisance shall be abated." Id.; see also Red Tags, Ex. 2 to Chandler Aff.

39. The red tags also fail to include a hearing date or provide any process to dispute the Unsafe Structure determination. Id.

40. Essentially, the City is condemning properties without explaining why, or providing the property owners with any opportunity to cure the unidentified issues or contest the City's unexplained findings as the City Code requires. Id.

41. Moreover, in violation of Michigan law, the City has improperly issued red tags on owner-occupied homes. Chandler Aff. 13.

42. Under Landmark Estates' prior ownership, a resident who had spent a month in the hospital returned to their home and found that the City had tagged his home as an unsafe structure that requires demolition. That resident was forced to vacate their home without being afforded any due process. See Letter from Michelle Oppelt to Senator Stephanie Chang, Ex. B.

43. In a separate instance, a single mother of three children came home to find that her home was also red tagged. This resulted in the mother and her children also having to vacate the home. This family was then left homeless for a period of months. Id.

44. Today, fear remains within the Warren MH communities that residents will be forced to vacate their homes as a result of the City's unlawful red tags. Chandler Aff. 13.

45. Although the City Attorney's office has acknowledged that the practice of tagging owner-occupied homes is improper, Mr. Impellizzeri has verbally stated, "I don't care." Id

46. Indeed, after Warren MH was advised by the City Attorney's office to remove the tags on owner-occupied homes, Mr. Impellizzeri reapplied the tags within days, and proceeded to tag additional homes as "unsafe structures" that "may be ordered demolished."

#### Improper Stop Work Orders, Unlawful Permit Denials, and Lack of Legal Clarity

47. In addition to the unlawful inspections and red tags, the City has also prevented Warren MH from renovating or obtaining permit approvals for existing homes.

48. Although the City has agreed that permits are not needed to make cosmetic repairs on existing homes, on August 1, 2025, Warren MH was making purely cosmetic repairs to an existing mobile home, when the City, through Mr. Impellizzeri, red-tagged that home and prevented further repairs. The City did so without entering the unit or conducting an interior inspection. Rather, Mr. Impellizzeri issued the red tag based solely on a visual observation from the street, and did not provide any notice or opportunity for a hearing to contest the red tag.

49. After Warren MH sent a cease and desist letter for the City to stop its unlawful actions, the City retaliated by, on August 28, 2025, ordering all crews at Warren MH to cease the purely cosmetic renovations of existing homes.

50. In instances where the City maintains permit approval is needed to engage in renovations, the City has continued to move the goalposts, and has refused to issue permits unless and until non-existent requirements are met. As examples:

a. The City has insisted that Warren MH provide a full engineered site plan before any new homes can be placed on existing lots. Chandler Aff. 16(a). There is no such requirement in the City Code or under state law.

b. The City has demanded manufacturer certifications and foundation specifications for existing homes from the 1980s and 1990s before allowing renovations to move forward. Id. 16(b). Again, there is no such requirement under the City

Code or state law. Rather, these requirements apply only to new installations.

c. In a separate instance, a permit was granted in 2023 for the placement of a new home on Lot 55B in Landmark Estates. When the same application was resubmitted in 2025 under identical conditions, the City refused to issue a decision, despite multiple follow-up requests. The City has never issued a denial, but has instead left the application in limbo. As of today, five follow-up requests have been sent, but no written response or permit decision has been provided. Id.

¶ 16(c), see also Chandler Emails, Ex. C.

d. And in still other instances, the City has imposed requirements that do not appear in state, federal, or local law that applies to manufactured housing communities, including, among other things: requiring new concrete piers for older homes; requiring permits for cosmetic work such as painting, drywalling, and skirting (even though the Code does not require permits for such activities); and requiring a 3 x 3 foot landing at the top of exterior stairs. Id. 16(d).

51. In addition, the City is attempting to hold Warren MH to present-day setback and construction standards, even though Michigan law provides that "[a] community constructed according to the standards in previous acts, rules, or local ordinances shall be maintained or altered in a manner consistent with the standards in effect at the time of original construction, including but not limited to spacing of homes, road widths and sizing and design of community infrastructure." Mich Admin Code R 125.1947a(3). See Chandler Aff. 17.

52. Because a 10 foot setback requirement existed at the time the Landmark community was constructed, that setback requirement remains in effect at that community today.

53. While Warren MH disputes that the City's above demands are lawful, in many instances, it has attempted to comply with these requirements in a showing of good faith.

54. For example, Warren MH Communities paid nearly \$10,000 to complete a full engineered site plan at the City's urging. But when it submitted this site plan to the City, the City failed to respond for two months. And to this day, the City has yet to act on or approve permits after receiving this site plan. Chandler Aff. ¶¶ 20-21, **Ex. A**; Chandler Emails, **Ex. C**.

55. The City's above demands appear to be based on a combination of the City's misunderstanding of applicable law and its animus toward manufactured housing communities.

56. As to the City's misunderstanding of applicable law, in several instances, in an attempt to comply with the City's shifting requirements, Warren MH has requested clarification as to which standards apply, but in response, it has received different answers from different individuals. Chandler Aff. 20.

57. For example, City Director of Building and Safety Engineering Kirk Rehn has repeatedly pointed to construction requirements in the Michigan Residential Code, even though that Code applies only to a manufactured home used as a single dwelling unit installed on privately owned (non-rental) lots. Id. 21; Chandler Emails, Ex. C

58. In contrast, City Inspector Mr. Impellizzeri has admitted there are no explicit requirements relating to several issues he has identified in red tags (such as pier depth, sheathing materials, or site plans). He has stated that manufactured housing communities are allowed to select the Code they are operating under, pointing to the Michigan Building Code, the Michigan Rehab Code, HUD requirements, or ANSI requirements. Chandler Aff. 22.

59. Thus, while Warren MH maintains it has complied with all applicable laws, and that the City has no basis for imposing the above requirements, the confusion within the City as to which requirements actually apply has made it impossible for Warren MH to move forward even if it wishes to comply with the City's shifting standards. Id. 23.

60. Each time Warren MH seeks to comply with these moving targets (such as the site plan requirement), the City imposes a new requirement that does not appear anywhere under applicable law. Warren MH has thus been unable to move in additional homes or obtain approval to renovate existing homes despite its numerous attempts to do so. And given the City's differing interpretations of the law, it is impossible to meet the City's ever-changing standards. Id.

61. As to the City's animus, the City's Inspector has made remarks to residents that he intends to have the park shut down; he has stated to other housing community operators "You really won't want me over there crawling through your entire park and flagging every single thing — I'll do it. and has told residents they should "live somewhere better." Id. 1[24.

### The Cumulative Effects and the City's Retaliation

62. Warren MH has repeatedly tried to resolve these issues with the City, but these efforts have only led to further retaliation, including actions that threaten the viability of the communities and the housing of hundreds of residents.

63. For example, during the summer of 2025, Warren MH attended a Zoom conference with counsel for the Michigan Manufactured Housing Association, Mr. Impellizzeri, and others in an attempt to resolve these issues. Chandler Aff. 26.

64. Following that conference, however, blight officers have begun appearing at Landmark Estates and Twin Pines nearly every day (even though in the prior twelve months of ownership, no blight officers appeared at the communities.

On October 2, 2025 alone, the City's blight officers issued 14 tickets. There has been a noticeable uptick in the City's patrolling and monitoring of the communities since that meeting.

65. Due to the City's actions, Warren MH faces significant and irreparable harm.

66. Because Warren MH is unable to move in residents off its waiting list; to construct new homes; or to renovate existing homes, the occupancy in its communities is declining. This is directly impacting Warren MH's ability to obtain loan refinancing and, therefore, directly impacting Warren MH's ability to continue operating. Chandler Aff. 27.

67. If the City is not forced to immediately comply with applicable law and issue permits; cease its unlawful inspections; cease its unlawful redtagging of owner-occupied homes; cease its unlawful redtagging of other homes in the Warren MH without following mandated procedures; and cease its practice of imposing requirements on the Warren MH Communities that do not exist under state, federal, or local law before the Warren MH Communities can renovate existing homes or construct new homes, then the Warren MH Communities face the imminent threat of going out of business. Ids 28.

68. The Warren MH Communities are already facing reputational harm as a result of the City's improper remarks to residents, and the City's actions which have prevented Warren IVIH from making improvements to the Communities. If left unremedied, Warren MH will also face significant financial harm, as it will be unable to recoup the investments it has already made to better the Warren MH Communities. Id. II 29.

69. The existing residents of Warren MH will also face significant harm, as they will be displaced from their homes. And the more than 50 individuals who are seeking to move into the Warren MH Communities will also be left without the opportunity to obtain quality affordable housing. Id.

70. Ultimately, not only will Warren MH suffer significant monetary loss, but hundreds of residents may be left without viable housing options due to the City's actions. Id

Motor City

71. These problems are not unique to Warren MH.

72. Motor City Mobile Home Park is located at 23765 Lawrence Avenue in the City of Warren. That community has experienced similar issues.

73. Prior to 2022, Motor City had a productive working relationship with the City. It had made significant investments within its community, including electrical work, water and plumbing improvements, drainage work, common area improvements, cosmetic improvements such as painting, and a backflow preventer. Affidavit of Jason Janda, 5, Ex. D.

74. In 2022, however, City Inspector John Impellizzeri became involved and the ability to continue operating and improving Motor City became significantly more difficult. Since that time, the City has prevented new or existing residents from occupying existing homes within the Community, and unlawfully ordered Motor City to reduce the number of available homes within the Community. Id. 6.

75. At the outset, in October 2022, Mr. Impellizzeri indicated that virtually every vacant home in Motor City must be torn down, despite not entering or inspecting the homes to assess their condition. Some of these homes were owner-occupied, leading those residents to fear that they would lose their homes. Mr. Impellizzeri did not conduct any formal inspection or follow any required procedures when doing so. Instead, he simply wrote down a list of numerous homes as "vacant, dilapidated, & unsafe trailers infested & unsecured." Id. 7; see also Ex. I to Janda Aff.

76. In an effort to cooperate, Motor City agreed to demolish seven of the homes, and Mr. Impellizzeri stated he would mark Motor City as being in compliance with the City's requirements. Janda Aff. 1[ 8.

77. Within two years of that, however, Mr. Impellizzeri stated that an additional nine homes must be demolished. He issued red tags on those homes, again without entering the homes

to inspect them or conducting any structural testing, even though the homes are legally compliant. In one instance, Mr. Impellizzeri issued a red tag on an owner-occupied home, causing the resident to have concerns that their home would be demolished. Id. 9.

78. When issuing these red tags, Mr. Impellizzeri failed to comply with the City's ordinances, which require the City to identify the issue rendering the structure unsafe, provide for the ability to cure the asserted issue, and provide for a hearing to contest the asserted issue. Effectively, Motor City has been left without any ability to challenge the City's unsafe structure or demolition notices. Id. 11 .

79. In April 2025, other inspectors from the City walked by homes that Mr. Impellizzeri had red tagged and they did not understand why the red tags had issued. Id

80. In addition, Mr. Impellizzeri has informed staff at Motor City that as soon as a home becomes vacant, it is removed from the available housing stock within Motor City; that homes must be built and renovated in accordance with the Michigan Residential Code; and he has labeled the homes at Motor City "campers" that cannot be renovated even though the title to the homes correctly recognizes them as manufactured houses. Id. 12.

81. The City's action have prevented Motor City from constructing new homes, renovating existing homes, and from moving new residents into Motor City, despite a demand from the City's residents to move into the community. Id. 13.

82. Even when Motor City has attempted to comply with the City's shifting (and improper) requirements, no progress has been made.

83. For example, Motor City obtained a professional zoning conformance report in September 2022, which found that the "existing use" of the community was "in conformance.'. Zoning Report, Ex. 3 to Janda Aff. This report explained that, while some aspects of the property (such as setbacks) were not compliant with the current zoning standards, "the subject property was

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constructed in 1950, which predates the current Zoning regulations, adopted June 9, 1987" and would be considered "pre-existing legal nonconforming." Id. 15; see also Mich Admin Code, R 125.1950(1)(c) ("A community licensed under the construction standards of previous acts and rules for which a license was legally issued and valid at the time of these rules, or any subsequent amendment of these rules, is not required to fulfill the current requirements for community construction in these rules hereto for any alteration projects. ").

84. The Zoning Report also includes a letter from the City's prior Zoning Inspector, Deborah Wenson, which states that a "site plan was never required for this property" and that "[t]here are certain areas of pre-emption on the part of the State of Michigan concerning the construction and operation of mobile home parks. One of the areas of pre-emption is the requirement of site plan approval by the local government." Id.

85. Ms. Wenson's Letter further notes that the "property has been in existence prior to the enactment of the current Zoning Ordinance" and that "[a]ny mobile home that has a permit and received final inspection approval is legal non-conforming." Id

86. Yet today, the City is still refusing to allow renovation of existing homes within the community. Motor City has more than 15 homes that it is seeking to renovate, but the City has issued red tags on 10 of these homes without following the required procedures. Motor City is hesitant to continue investing and completing work to improve the non-red tagged homes because, based on past experience, it is likely that the City will immediately red tag those homes, as well. Janda Aff. 19.

87. The City's actions of ordering homes to be demolished, and red tagging the remaining homes, has created significant financial loss to Motor City. The inability to construct new homes or move residents into existing homes has directly impacted occupancy levels. And the decrease in occupancy levels has directly impacted Motor City's ability to obtain loan financing, which will allow for further improvements to the community. Id.

88. This not only impacts Motor City, but it has also reduced the availability of affordable housing for residents of the City of Warren who wish to move into Motor City.

#### Woodview

89. Similarly, Woodview Mobile Village Mobile Home Park was located at 7062 Ready Avenue, Warren MI.

90. Woodview was licensed for 91 lots.

91. The City prevented new or existing residents from occupying existing homes within Woodview, and unlawfully ordered Woodview to reduce the number of available homes.

92. In 2022, Mr. Impellizzeri directed Woodview to re-map the community and, without any basis in law, indicated that the total number of sites should be reduced by one quarter.

93. In a good faith attempt to cooperate, Woodview retained a professional engineering firm to re-map the entire community with only 73 sites.

94. After spending time and money to develop and submit the re-mapped plan, however, Woodview did not receive any further communication from Mr. Impellizzeri regarding the matter, nor did it receive any approvals from the City.

95. Instead, Mr. Impellizzeri ordered the Community to demolish 23 homes.

96. The City also issued "red tags" (notices of unsafe structure) on numerous homes within the Community. As with the Warren MH and Motor City properties, Mr. Impellizzeri did not follow the required procedures for red tagging homes, and did not provide the required notice and opportunity for a hearing to contest the demolition order.

97. This prevented Woodview from moving new or existing residents into these homes, and left Woodview without any ability to challenge the City's finding of an unsafe structure.

98. The City's actions, which led to a decrease in occupancy, directly impacted Woodview's ability to obtain loan refinancing, which depends on certain occupancy levels within its community.

99. Not only that, but upon information and belief, when Woodview sought to refinance the properties, Mr. Impellizzeri took it on himself to inform the lender that the property was a "landfill" and advised the lender not to finance the property.

100. Ultimately, these actions significantly constrained Woodview's ability to successfully operate.

### Continental

101. As one last example, Continental Mobile Village Mobile Home Park was located at 20785 Schultes Avenue, Warren, Michigan, and experienced similar issues.

102. There, the City attempted to impose a 20-foot setback requirement, and blocked the infill of over 20 lots.

103. Under the Michigan Administrative Code, "[a] community constructed according to the standards in previous acts, rules, or local ordinances shall be maintained or altered in a

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manner consistent with the standards in effect at the time of original construction, including but not limited to spacing of homes, road widths and sizing and design of community infrastructure." Mich Admin Code R 125.1947a(3).

104. Continental was originally constructed before a 20 foot setback requirement existed, and the setback requirement in place at the time of original construction should have continued to apply at the Community.

105. Due to the City's improper insistence on enforcing a greater setback requirement, Continental was blocked from infilling over 20 lots, preventing the addition of new homes and the expansion of affordable housing opportunities. Blank Aff. ¶¶ 6-7, **Ex. E**.

106. The City also issued "red tags" (notices of unsafe structure) on many homes within Continental. When doing so, the City failed to comply with its ordinances, which require the City to identify the issue rendering the structure unsafe, provide for the ability to cure the asserted issue, and provide for a hearing to contest the asserted issue. *Id.* 8.

107. As a result, Continental was precluded from moving new or existing residents into these homes, and it was left without any ability to challenge the City's finding of an unsafe structure. *Id.* 9.

108. These actions created significant operational and financial challenges and ultimately forced Continental into receivership. This community has since ceased operating, displacing the residents that lived there. *Id.* ¶¶ 10-13.

109. In the aggregate, these practices mirror those struck down in Knibbe, where the Michigan Supreme Court held that Warren's refusal to permit mobile home parks was arbitrary, capricious, and not a valid exercise of police power. As in Knibbe, the City's current practices

reflect a deliberate policy to exclude manufactured housing communities, regardless of the consequences for residents and the broader public.

COUNT 1  
WRIT OF MANDAMUS

110. Plaintiff incorporates by reference the foregoing paragraphs.

111. "To obtain a writ of mandamus the plaintiff must show that: (1) the plaintiff has a clear legal right to the performance of the duty sought to be compelled, (2) the defendant has a clear legal duty to perform, (3) the act is ministerial in nature, and (4) the plaintiff has no other adequate legal or equitable remedy." *White-Bey v. Dep 'l. of Corrections*, 239 Mich App 221 ,223-24 (1999).

112. Plaintiff has a clear legal right under the Act and the City Code to (1) obtain permits for the replacement of existing manufactured homes with new manufactured homes when the permit applications comply with applicable law and requirements; (2) to renovate existing homes in accordance with applicable law; (3) for the City to otherwise follow applicable law during the permitting process (including by not requiring permits for cosmetic work or other non-structural improvements); (4) to be free from unlawful, arbitrary, and repeated inspections and monitoring; and (5) for the City to follow applicable law and provide proper procedural protections before and after homes are red tagged. See *Adams v Parole Board*, 340 Mich App 251, 263; 985 NW2d 881 (2022) (granting mandamus when "plaintiff requested that defendant comply with the applicable statute in undertaking its decision" as to whether or not to grant parole).

113. Defendant has a corresponding clear legal duty to comply with the above requirements. See *id.* (finding a clear legal duty for an agency to "comply with its statutory

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requirements and guidelines in exercising its discretion and issuing its parole decision" and "to obey the Michigan and US Constitutions").

114. Specifically, Mr. Impellizzeri, in his capacity as Building Inspector, has a clear legal duty to follow applicable law as it relates to the manner and frequency of inspections, and as it relates to the manner and procedures followed when issuing red tags.

115. Likewise, Mr. Rehn, in his capacity as Director of Building and Safety Engineering, has a clear legal duty to follow applicable law as it relates to the consideration and issuance of permits.

116. These duties are ministerial: the City is required to process applications and issue permits where the applicant satisfies the governing standards, and it has no discretion to impose requirements inconsistent with state law.

117. The City is also constrained by Michigan law in the manner and frequency of inspections it may conduct. See MCL 125.2307(7); Mich Admin Code R 125.1190(1) (defining "inspection" to include "drive-throughs, walk-throughs, compliance inspections, or any other means from which visual or oral information would be obtained pertaining to the management or operation, or both, or any other aspect" of the community).

118. And it must follow the specific requirements set forth in the City Code when red tagging homes. Adams, 340 Mich App at 264 (the issue of "whether defendant complied with its statutory obligations" is ministerial, and "[w]hen agencies of government fail to perform duties imposed by the Legislature or the constitution, the courts will not hesitate to order performance").

119. Despite these duties, the City, through Mr. Rehn, has refused or failed to act upon permit applications submitted by Plaintiff's members, including applications that were identical

to previously approved applications. In other instances, the City has improperly denied permits based on setback requirements preempted by the Act, MCL 125.2307. And in other instances, it is improperly requiring permits to complete purely cosmetic repairs.

120. The City, through Mr. Rehn, has further obstructed permit issuance by imposing unlawful, extra statutory requirements such as engineered site plans, new foundation piers, and unattainable manufacturer "roadworthiness" letters for older homes—that have no basis in Michigan law or the City's Code.

121. In addition, the City, through Mr. Impellizzeri, has continued to conduct unlawful inspections. Contrary to Michigan law, Mr. Impellizzeri has repeatedly inspected homes that are owned by the occupants.

122. Also contrary to Michigan law, Mr. Impellizzeri, is engaged in a practice of continuous monitoring and inspections of rented mobile homes. Rather than inspecting homes "for safety" with "not less than 3 years" between inspections, Mr. Impellizzeri has driven through the Association's communities on a weekly (and, at times, twice-daily) basis to monitor and inspect homes. These inspections are not conducted for "safety reasons," but are instead a pretext searching for a reason to issue red tags or otherwise shutdown the Association's communities.

123. Finally, the City, through Mr. Impellizzeri, has continued to issue red tags without following the proper procedures. Mr. Impellizzeri has issued red tags on owner-occupied homes despite the City Attorney's office's recognition that doing so is improper. And, given Mr. Impellizzeri's statement that he does "not care" about this, there is no indication he will cease doing so in the future.

124. Moreover, the many red tags issued by Mr. Impellizzeri fail to specify the "condition of the building" that presents a nuisance and the "repairs necessary to abate the nuisance and the time within which the nuisance shall be abated." The red tags also fail to include a hearing date and process to dispute the Unsafe Structure determination.

125. The Association and its members have no adequate remedy at law. The Association and its members have repeatedly requested that the City cease its improper actions to no avail. See Cease and Desist Letters, Ex. F. The City is not providing for the required hearings when issuing red tags, so the Association's members cannot contest the City's findings through administrative proceedings. And the City is regularly refusing to rule on permit applications, again preventing the Association's members from challenging those (constructive, but not actual) denials of permit applications through other avenues.

126. The City is continually moving the goalposts, and preventing the Association's members from constructing new homes, renovating existing homes, and taking other actions needed to continue operating.

#### COUNT 11 DECLARATORY JUDGMENT

127. Plaintiff incorporates by reference the foregoing paragraphs.

128. Pursuant to MCR 2.605(A)(1), "In a case of actual controversy within its jurisdiction, a Michigan court of record may declare the rights and other legal relations of an interested party seeking a declaratory judgment, whether or not other relief is or could be sought or granted."

129. "An actual controversy exists when a declaratory judgment is needed to guide a party's future conduct in order to preserve that party's legal rights." League of Women Voters of Mich. v. Secretary of State, 506 Mich 561, 586 (2020).

130. Among other things, the Association's members are aggrieved by the City of Warren's pattern and practice of refusing to issue permits for the construction of new homes or the replacement and renovation of existing homes; imposing unlawful requirements before permits will issue; red-tagging homes without following required procedures; and conducting unlawful inspections.

131. An actual controversy exists between Plaintiff and Defendant concerning the scope of the City's legal authority. Plaintiff and its members have repeatedly raised these issues to the City, and the City has refused to change its conduct. Specifically, there is a dispute as to:

- a. Whether the City may impose permitting requirements not authorized by the Act or the City's Code of Ordinances;
- b. Whether the City may delay or fail to act upon permit applications, thereby effectively denying them without rendering a decision;
- c. Whether the City may enforce current setback requirements against manufactured housing communities even though those requirements exceed the requirements in place at the time communities were constructed and were not approved by the Mobile Home Commission as required by MCL 125.2307;
- d. Whether the City may red-tag occupied or resident-owned homes without notice, inspection, or due process, contrary to the City's Code and the Act;
- e. Whether the City may red-tag rented homes without notice, inspection, or due process, contrary to the City's Code and the Act;
- f. Whether the City may inspect owner-occupied homes despite the Act reserving such authority to the State of Michigan; and

g. Whether the City may conduct weekly or daily inspections on rented homes in the absence of a complaint from the tenant.

132. Declaratory relief is also needed to clarify which standards apply to the Association's members going forward. Different individuals within the City have sought to impose different (and ever-changing) requirements when the Association's members have attempted to construct new homes or renovate existing homes.

133. This has resulted in significant confusion and rendered it impossible to meet these unknown standards. Clarity is needed so that the Association's members can seek to comply with applicable law, and so that the City can enforce the correct law in a uniform manner, rather than enforcing a patchwork of laws that different employees apply in different manners.

134. Plaintiff and its members require a declaration of rights to guide their future conduct and preserve their ability to replace homes, operate communities, and house residents without unlawful obstruction by the City.

135. Absent declaratory relief, Plaintiff will continue to face arbitrary enforcement, permit denials, and unlawful red-tagging, resulting in displacement of residents and loss of affordable housing units.

#### COUNT 111 VIOLATION OF DUE PROCESS

136. Plaintiff incorporates by reference the foregoing paragraphs.

137. Article 1, 17 of the Michigan Constitution provides that "[n]o person shall be . . . deprived of life, liberty or property, without due process of law. "

138. Residents of manufactured housing communities in Warren, including the Association's members, possess constitutionally protected property interests in their homes and in the continued use and occupancy of those homes.

139. The Association's member communities likewise possess constitutionally protected property interests in the lawful use of their communities, including the right to replace and rehabilitate homes consistent with state law.

140. The City, acting through its officials, has repeatedly deprived residents and Association members of those property interests without due process of law. Specifically, the City has:

- a. Red-tagged homes without conducting inspections, issuing written notice, or providing an opportunity to cure or contest the alleged violations, in direct contravention of the City's Code and state law, preventing the use or occupancy of these homes;
- b. Constructively denied permit applications by failing to render any decision, thereby depriving community owners of the lawful use of their property without explanation or process; and
- c. Enforced arbitrary and extra-statutory requirements for permitting, creating shifting standards that applicants cannot meaningfully challenge or appeal.

141. These actions have caused residents to be displaced from their homes — in some cases rendered residents homeless — and have deprived Plaintiffs members of the economic use of their communities.

142. The City's conduct constitutes arbitrary and capricious government action not reasonably related to public health or safety, and therefore violates the Due Process Clause of the Michigan Constitution, Const 1963, art 1, 17.

COUNT IV

PRELIMINARY AND PERMANENT INJUNCTION 143.

Plaintiff incorporates by reference the foregoing paragraphs. 144. To obtain injunctive relief, a plaintiff must show: (1) irreparable harm will occur without the injunction; (2) the harm to the plaintiff absent the injunction outweighs the harm to the defendant if the injunction is granted; (3) the plaintiff is likely to prevail on the merits; and

(4) the public interest will be served by the injunction. *Detroit Fire Fighters Ass'n IAFF Local 344 v Detroit*, 482 Mich 18, 34 (2008).

145. Plaintiff and its members will suffer irreparable harm absent injunctive relief. Without judicial intervention, the City will continue to obstruct the permitting and rehabilitation of manufactured homes, unlawfully red-tag occupied homes, and enforce preempted setback requirements, thereby displacing residents, reducing the supply of affordable housing, and depriving Association members of the lawful use of their property.

146. The City's actions have already led to the closure of manufactured housing communities. And, if not immediately corrected, it will lead to the imminent closure of other communities, such as Landmark Estates or Twin Pines.

147. Moreover, the City's due process violations are presumptively irreparable. E.g., *Obama for America v Husted*, 697 F3d 423, 436 (CA 6, 2012). And, as set forth above, the City and its Inspector's actions are causing reputational harm.

148. The harm to Plaintiff outweighs any harm to the City. Enjoining the City from enforcing unlawful ordinances and practices imposes no legally cognizable burden on the City, but it will protect residents from displacement and preserve affordable housing. Indeed, as set forth in

the affidavit of Brenton Chandler and its supporting documents, the residents of these communities are concerned with the City's actions.

149. Plaintiff is likely to prevail on the merits of its claims. The City's conduct violates the Act, exceeds the authority of the City's Code of Ordinances, and has already been condemned by the Michigan Supreme Court in Knibbe, which held that Warren's obstruction of mobile home permitting was arbitrary, capricious, and unlawful.

150. Granting injunctive relief serves the public interest. Manufactured housing provides critical affordable housing opportunities for Warren residents. Preventing the City from unlawfully red-tagging homes and obstructing permits will advance the public welfare, protect residents from homelessness, and ensure compliance with Michigan law.

REOUEST FOR RELIEF

WHEREFORE, Plaintiff Michigan Manufactured Housing Association respectfully requests that this Court grant the following relief:

- A) Issue a Writ of Mandamus compelling the City of Warren to (1) issue permits for the replacement of existing manufactured homes with new manufactured homes that comply with applicable law; (2) refrain from imposing unlawful and extrastatutory requirements on Plaintiffs members who seek to renovate existing homes and construct new homes in accordance with applicable law; (3) otherwise follow applicable law during the permitting process, including by not requiring permits for cosmetic work; (4) abstain from unlawful, arbitrary, and constant inspections; and (5) follow applicable law and proper procedural requirements before and after homes are red tagged.

B) Enter a Judgment:

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- i) Declaring that the City must issue permits allowing for the construction of new homes and renovation of existing homes when the permit applications comply with applicable law and requirements.
- ii) Declaring that the City may not impose unlawful and extrastatutory permitting requirements that do not appear in state or local law, including that the City may not enforce its setback ordinance against manufactured housing communities when the ordinance is preempted by MCL 125.2307.
- iii) Declaring that the City may not delay or fail to act upon permit applications, thereby effectively denying them without rendering a decision;
- iv) Declaring that the City may not red-tag occupied or resident-owned homes without notice, inspection, or due process, contrary to the City's Code and the Act.
- v) Declaring that the City must comply with the City Code and applicable law when red tagging homes.
- vi) Declaring that the City may not conduct inspections on owner-occupied homes.
- vii) Declaring that the City may not conduct weekly or daily inspections on rented homes in the absence of a complaint from the tenant.
- viii) Declaring that the City must comply with applicable state and local law when inspecting manufactured housing communities.
- ix) Clarifying the applicable law that applies to the construction of new homes, renovation of existing homes, redtagging of homes, and inspection of homes, given the City's conflicting interpretations.
- x) Declaring that the City of Warren's conduct violates the Due Process

Clause of the Michigan Constitution, Const 1963, art I 17;

- C) Enter Preliminary and Permanent Injunctions enjoining the City of Warren from:
- i) Refusing to issue permits, or failing to rule on permit applications, that would allow for the construction of new homes and renovation of existing homes when the permit applications comply with applicable law and requirements.
  - ii) Imposing unlawful and extrastatutory permitting requirements that do not appear in state or local law, including the City's attempts to enforce its setback ordinance against manufactured housing communities when the ordinance is preempted by MCL 125.2307, when ruling on permit applications or issuing stop work orders
  - iii) Applying inconsistent and unclear requirements in response to applications or requests to construct new homes or renovate existing homes, and issuing stop work orders as a result of this inconsistent application.
  - iv) Redtagging owner-occupied homes in violation of state law.
  - v) Redtagging homes without following the required procedures under the City Code and applicable law, and without providing for notice or any opportunity to contest the red tag.
  - vi) Inspecting owner-occupied homes.
  - vii) Conducting weekly or daily inspections on rented homes in the absence of a complaint from the tenant.
  - viii) Failing to comply with applicable law relating to permitting applications, inspections, and red tagging.

D) Award Plaintiff its costs, disbursements, and reasonable attorneys' fees to the

extent permitted by law; and

E) Grant such other and further relief as this Court deems just and proper.

Dated: October 23, 2025

025171.000044 4921-5281-4170.12

[s/ Jason T. Hanselman

Jason T. Hanselman

(P61813)

Kyle M. Asher (P80359)

DYKEMA GOSSETT PLLC

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Townsend

St., Suite

900

Lansing,

MI 48933

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517-374-

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Attorneys for Plaintiff



# Exhibit A

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF MACOMB

MICHIGAN MANUFACTURED HOUSING ASSOCIATION.

Plaintiff,

Case No. 25- \_\_\_\_\_ -cz

Hon .

CITY OF WARREN,

Defendant.

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AFFIDAVIT OF BRENTON CHANDLER

STATE OF-Tnas---- )

COUNTY OF-ULLciS- )

I, Brenton Chandler, being first duly sworn, states:

1) I have personal knowledge of the facts in this Affidavit or base such knowledge on the business records retained by Warren Holdings LLC ("Warren MH") and its subsidiaries in the ordinary course of business. I am competent to so testify.

2) I am the Managing Member and majority owner of Warren MH. In 2024, Warren MH acquired ownership interests in two manufactured housing communities located in the City of Warren — Landmark Estates and Twin Pines (together, the "Warren MH Communities").

3) Since acquiring these communities in 2024, Warren MH has invested over \$500,000 in structural and cosmetic improvements within the Warren MH Communities, including utility

infrastructure upgrades, asphalt and concrete repairs and replacements, demolitions of unsuitable homes, tree trimmings and removals, and other repairs and general property clean-up.

Examples of the improvements made to the Warren MH Communities are attached as Exhibit 1. 4)

Warren MH has also earmarked an additional \$675,000 for future investments, including \$300,000 held in escrow to bring in 15 additional mobile homes and expand the supply of affordable housing in the City of Warren.

5) There is significant demand for the quality affordable housing provided in Landmark Estates and Twin Pines. As of August 2025, there was a waitlist of more than 50 individuals seeking housing in these communities,

6) The City of Warren's actions have prevented Warren MH from moving new tenants into its communities, adding new housing, and renovating or improving existing housing over the past year,

7) The City has conducted inspections of homes in Landmark Estates and Twin Pines in violation of the Michigan Mobile Home Commission Act, MCL 125.2307(7). This statute provides that "a local government may adopt an ordinance to inspect mobile homes for safety within a mobile home park... if the mobile home being inspected is being rented to a tenant by the owner of the mobile home." It also states that "[i]f a local government inspects mobile homes rented to tenants by the owner for safety, the period between inspections shall not be less than 3 years unless the local government is responding to a complaint from a tenant."

8) Contrary to state law, the City, through its Inspector John Impellizzeri, has repeatedly inspected owner-occupied homes (as opposed to homes being rented to tenants).

9) In addition, the City, through its Inspector John Impellizzeri, has also inspected homes rented to tenants on a far more frequent basis than once every three years, in the absence of tenant complaints, City inspectors have patrolled the communities weekly, and at times twice daily, to conduct inspections without any lawful basis.

10) Not only that. but at times, City inspectors have entered unoccupied homes within the Warren MH Communities without seeking any approval to do so, and without contacting Warren MH before doing so.

I 1) The City's inspections appear to be designed to harass Warren MH and its residents, as well as to identify any pretext to issue Unsafe Structure Notices (red tags) and force residents out of their homes.

12) The City has issued numerous Unsafe Structure notices (red tags) at the Warren MH Communities without following the procedures outlined in the City Code, including failing to provide written notice of the alleged dangerous conditions, failing to provide any opportunity to cure the asserted issues and conduct necessary repairs, and failing to provide a hearing date to contest the determination. True and accurate copies of red tags issued by the City are attached as Exhibit 2 to this Affidavit.

13) Also contrary to state and local law, the City has issued red tags on owner-occupied homes in the Warren MH Communities. These red tags issued on owner-occupied homes have created fear within the Warren MH Communities that residents will be forced to vacate or will lose their homes.

14) The City Attorney's office has acknowledged to me that tagging owner-occupied homes is improper. In response, City Inspector John Impellizzeri has continued to apply red tags on owner-occupied homes, and has verbally stated, "I don't care."

15) The City has also issued improper stop work orders and denied permits for renovations and new installations, often imposing non-existent requirements or refusing to issue decisions on permit applications,

- 16) Examples of the City's improper permit denials or inaction include:
- a) Requiring a full engineered site plan for the Warren MH Communities before a single new home could be infilled on a single lot, contrary to the City Code and state law;
  - b) Demanding manufacturer certifications and foundation specifications for homes from the 1980s and 1990s, which are not required under applicable law;
  - c) A permit was granted at Lot 55 B in Landmark Estates in 2023 (when a different group owned the community), allowing for the placement of a new home on the lot. At that time, the City did not request or require an engineered site plan. That home was never built. Less than two years later, Warren MH reapplied for an identical permit at that same lot under identical conditions. The City has refused to issue a decision despite at least five follow-up requests. This application has been left in limbo, prohibiting Warren MH from moving forward. And the City is now imposing new requirements that it never requested or required in 2023.
  - d) The City has imposed requirements that do not appear in state, federal, or local law that applies to manufactured housing communities, including, among other things: requiring new concrete piers for older homes (even though Mich Admin Code **125.1606(6)** allows for continued use of existing foundations if sound); requiring permits for cosmetic work such as painting,

drywalling, and skirting (even though the Code does not require pennit+k for such activities); and requiring a 3 x 3 foot landing at the top of exterior stairs.

17)The City has also attempted to enforce present-day setbacks and construction standards at the Warren MH Communities, even though Michigan law provides that communities may be maintained according to the standards in effect at the time of their original construction.

18)Warren MH Communities has repeatedly disputed that the above requirements are consistent with federal, state, or local law, Nevertheless, in many instances, it has attempted to comply with these requirements in a showing of good faith,

19)For example, Warren MH Communities paid nearly \$10,000 to complete a full engineered site plan at the City's urging. But when it submitted this site plan to the City, the City failed to respond for two months. And to this day, the City has yet to act on or approve permits after receiving this site plan.

20)In several other instances, in an attempt to comply with the City's shifting requirements, I have requested clarification as to which requirements apply, and the basis for those requirements. In response, I have received different answers from different individuals.

21)For example, the City's Director Building and Safety Engineering Kirk Rehn has repeatedly pointed to construction requirements set forth in the Michigan Residential Code, even though

that Code expressly states that it is applicable only to a manufactured home used as a single dwelling unit installed on privately owned (non-rental) lots.

22) In contrast, City Inspector Mr. Impellizzeri has admitted there are no explicit requirements relating to several issues he has identified in red tags (such as pier depth, sheathing materials, or site plans). He has stated that manufactured housing communities are allowed to select the Code they are operating under, pointing to the Michigan Building Code, the Michigan

Rehab Code, HUD requirements, or ANSI requirements,

23) Thus, while Warren MH maintains it has complied with all applicable laws, and that the City has no basis for imposing the above requirements, the confusion within the City as to which requirements actually apply has made it impossible for Warren MH to move forward even if it wishes to comply with the City's shifting standards. Each time Warren MH seeks to comply with these moving targets (such as the site plan requirement), the City imposes a new requirement that does not appear anywhere under applicable law. As a result, Warren MH has been unable to move in additional homes or obtain approval to renovate existing homes despite its numerous attempts to do so.

24) The City's actions, including remarks by its Inspector that he intends to shut down the park and that residents should live somewhere better, demonstrate animus toward manufactured housing communities.

Among other things, City Inspector Impellizzeri has stated that homes within the Warren MH Communities "were never meant to [be] live[d] in", that they are not "worth saving"; and has encouraged their removal even if they are legally compliant.

25) Warren MH has made repeated efforts to resolve these issues with the City, but these efforts have only led to further retaliation, including actions that threaten the viability of the communities and the housing of hundreds of residents.

26) For example, during the summer of 2025, I attended a Zoom conference with counsel for the Michigan Manufactured Housing Association, Mr. Impellizzeri, and others in an attempt to resolve these issues. Following that conference, however, blight officers have begun appearing at Landmark Estates and Twin Pines between one and three times per week (even though in the prior twelve months of ownership, no blight officers appeared at the communities. On October 2, 2025 alone, the City's blight officers issued 14 tickets. There has been a noticeable uptick in the City's patrolling and monitoring of the communities since that meeting.

27) Due to the City's actions. Warren MH faces significant and irreparable harm. Because Chandler is unable to move in residents off its waiting list; to construct new homes; or to renovate existing homes, the occupancy in its communities is declining. This is directly impacting

Warren MH's ability to obtain loan refinancing when necessary and, therefore, directly impacting Warren MH's ability to continue operating.

28) If the City is not forced to immediately comply with applicable law and issue permits; cease its unlawful inspections; cease its unlawful redtagging of owner-occupied homes; cease its unlawful redtagging of other homes in the Warren MH Communities without following mandated procedures; and cease its practice of imposing requirements on the Warren MH Communities that do not exist under state, federal, or local law before the Warren MH Communities can renovate existing homes or construct new homes, then the Warren MH Communities face the imminent threat of irrevocable economic damage.

29) The Warren MH Communities are already facing reputational harm as a result of the City's improper remarks to residents, and the City's actions which have prevented Warren MH from making improvements to the Communities. If left unremedied, Warren MH will also face irreparable financial harm, as it will be unable to recoup the investments it has already made to better the Warren MH Communities. The existing residents of Warren MH will also face significant harm, as they will be displaced from their homes. And the more than 50 individuals who are seeking to move into the Warren MH Communities will also be left without the opportunity to obtain quality affordable housing.

[signature page to follow]

I declare under penalty of perjury under the laws of the State and that the foregoing is true and correct to the best of my knowledge, information, and belief.

Further affiant sayeth not.

  
Brenton Chandler  
Partner, Warren MH LLC

Subscribed and sworn to by ga.nbn-Qaæle before me on the \_\_\_\_\_ day of October, 2025.

Signature 

Printed name Maribel Mendoza

Notary public, State of Texas, County of Harris

My commission expires 10/15/2025

MARIBEL MENDOZA Notary Public, State of Texas Comm. Expires 10-15- 2025 Notary ID 133394995
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# Exhibit I

Kelly Whitfield

Hitched Wholesale

Jul 30, 2025 | 19 Photos



# Twin Pines MHP, Lot#35 Railroad

in Pines MHP lot 35 - Twin Pines MH

## Before & After

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lot 35



Front of home before

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Client : Wendell\Curry

Front of home after

Project: Twin Pines MHP 35  
Date: Jul 29, 2025, 3 : 19 PM  
Author :

Before After  
Twin Pines Lot#35 Railroad

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### Back of home before

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Project: Twin Pines MHP lot 35

Date: Apr 2025 11:22 AM Creator: Wendell Curry

### Back of home after

Project: Twin MHP lot  
Date: Jul 29, 3:20  
Creator:

Before &

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Jul 30, 2025

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Wendell Curry

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Client: Wendell Curry

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Jul 22, 2025 | 19 Photos



# Twin Pines MHP- Site 32 Railroad

Rehab Photo Progress Report

Twin Pines MHP Lot 32 - Twin Pines MHP- Site 32 Rail

## Before & After





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## Front of home Before

Project: Twin Pines MHP Lat 32  
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Client: Wendel\Curry

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## Front of Home After

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TWin Pines MHP- Site Railroad

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Creator: Wendell Curry

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## Livingroom After

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Jul 22, 2025, 11:07 AM  
C 40t0r: Stephanie Herran

## Kitchen Before

Lat 32  
AM

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Project: Twin Pines MHP  
Date: Apr 2025, 11:51  
Author: Wendell Curry

MHP :

## Kitchen Before

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Project: TWIn Pines MHP Lat 32  
Date: Apr % 202 11 : 51 AM  
Author: Wendel\ Curry

## Kitchen After

Lat 32

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Bathroom Before

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Bathroom After

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Bedroom Before

Project: Twin Pines MHP Lat

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O att r : Wendell Curry

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Bedroom Before

Project: Twin Pines MHP Lat 32

D:\Bte: Apr 2025 , 11 : AM att r : Wendell  
Curry

2025.04.22

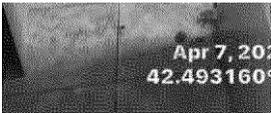
After

Pr: TWin Pines MHP Lat 32

Project: Twin Pines MHP Lat 32

Date: Apr 2025 . 11 : AM at r : Wendell Curry

After



Bedroom

After

Project: Twin Pines MHP Lat 32

April 22, 2025, 11:05 AM

Collector: Stephanie Herran

Hallway Before

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Hallway

## After

Pr: Twin Pines MHP Lat 32

04/22/2025, 11:05 AM

C 40t0r: Stephanie Herran

## Bedroom 2 Before

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Project: Twin Pines MHP Lat 32

Date: Apr 2025, 11:05 AM Att r: Wendell Curry

## Bedroom 2

Pr : TWin Pines MHP Lat 32

## After

Jul 22, 2025, 11:08

Afvl

C 40t0r: Stephanie Herran

# Exhibit 2

City of Warr  
29500 Van Dyke Ave.  
Phone: 574-4504

**INSPECTION NOT APPROVE**

Please make corrections and recall for inspection within ten (10) days.

Address LANDMARK

Permit # \_\_\_\_\_ Date 12/22/23

~~DO NOT REMOVE~~  
~~UNSAFE STRUCTURE~~

Inspector JOHN E.

# UNSAFE STRUCTURE

THIS BUILDING MAY BE  
ORDERED DEMOLISHED BY  
THE CITY OF WARREN

Ordinance 80 625, Chapter 9, Article 2, Section 9-165

DATE: 12.12.23	DIVISION OF BUILDING & SAFETY ENGINEERING 1 City Square, Suite #305 PHONE: 574-4504 WARREN, MICHIGAN
INSPECTOR:	
JOHN I	

BY



# UNSAFE STRUCTURE

THIS BUILDING MAY BE  
ORDERED DEMOLISHED BY  
THE CITY OF WARREN

Ordinance 80 625, Chapter 9, Article 2, Section 9-165

DATE: 11.28.23	DIVISION OF BUILDING & SAFETY ENGINEERING 1 City Square, Suite #305 PHONE: 574-4504 WARREN, MICHIGAN
INSPECTOR:	
JOHN I.	

UNSAFE  
STRUCTURE  
THIS BUILDING MAY  
BE  
ORDERED  
DEMOLISHED BY  
THE CITY OF WARREN

Ordinance 80625, Chapter 9, Article VI, Division 2, Section 9-165

PATE

DIVISION OF BUILDINGS

&

SAFETY ENGINEER

1 City Square, Suite #305

INSPECTOR

574-4504 WARREN MICHIGAN

# UNSAFE STRUCTURE

THIS BUILDING MAY BE  
ORDERED DEMOLISHED BY  
THE CITY OF WARREN

Ordinance 80 625, Chapter 9, Article 2, Section 9-165

DATE: 12.12.23	DIVISION OF BUILDING & SAFETY ENGINEERING 1 City Square, Suite #305 PHONE: 574-4504 WARREN, MICHIGAN
INSPECTOR: JOHN I	

# UNSAFE STRUCTURE

THIS BUILDING MAY BE  
ORDERED DEMOLISHED BY  
THE CITY OF WARREN

Ordinance 80 625, Chapter 9, Article 2, Section 9-165

DATE: 6-7-24	DIVISION OF BUILDING & SAFETY ENGINEERING 1 City Square, Suite #305 PHONE: 574-4504 WARREN, MICHIGAN
INSPECTOR:	
JOHN I.	

# Exhibit B

Dear Senator Chang,

I thank you again for the opportunity to continue our discussions regarding Landmark Estates, a manufactured housing community that we proudly serve in Warren, Michigan. I have spent the last several weeks reviewing as much documentation, testimony, and data as I could regarding Landmark Estates, in order to provide you with the most thorough response possible at this time.

In the enclosed letter, you will find the following:

Section 1 : A list of testimonials from current residents at Landmark Estates

Summary: 96% of resident feedback came back positive. The vast majority of residents are happy with the improvements we've completed at Landmark. Residents mention multiple times their fear of losing their homes and being displaced. Section 4 outlines the City's actions that are causing this fear.

Section 2: A full list of the capital improvements completed at Landmark Estates to date. Summary: Nearly \$580,000 has been invested in capital improvements at Landmark over the past two years, including extensive tree work, large scale water/sewer infrastructure upgrades, electrical repairs, road repair and resealing, demolition of older homes not available to occupy, and the eradication of the rat infestation that existed when we took over.

Section 3: Notices to residents and City Council members updating them on progress

Summary: We have regular and ongoing communication with our residents at Landmark

Estates, in order to provide them with updates, as well as notify them of any community events (examples of resident communication included in this section). Up until the end of 2022, we also provided regular and routine updates to the City of Warren, including all City Council members, until we were advised by Councilwoman Rogensues at the end of 2022 that we should stop direct communication, and instead redirect communication going forward through our

attorneys. Details and examples of these various communications are included in this section.

**Section 4: Challenges with the City and improper tagging of homes by the City Inspector Summary:** The tagging of homes by the City Inspector without following the proper legal process has, and continues to, cause displacement of resident homeowners. Included in this section is a copy of an email update that we had sent to the City Council where we alerted City Council members that residents were becoming displaced and homeless as a result of the improper actions of the City Inspector. Photos examples of tags that have been improperly placed are included in this section, as well as copies of the city ordinances that are being violated regarding these tags. Residents have vocalized to us consistently that their biggest fear at Landmark Estates is them coming home one day to a tag that causes them to lose their home. This is a direct action of a City Official, not us. This was the case for one resident who came home after being in the hospital for a month to find her home tagged, and she was forced to leave. We also had a previous resident, a single mother of three children, who told us she came home to find her home was tagged and this resulted in her and her children becoming homeless for months. These are just two out of many examples of residents becoming displaced due to the City Inspector's actions. When we brought this up to the City Council over a year ago (a copy of the email we sent alerting the city council of residents becoming displaced is included in Section 4), nothing was done to stop the inspector from continuing to improperly tag residents' homes. He still continues this practice to this day, even though the City Attorney has confirmed both to us as well as to our attorney that the tags are being improperly placed. I hope we can all agree this is incredibly unfair to these homeowners and needs to stop.

**Section 5: Our hopes for moving forward**

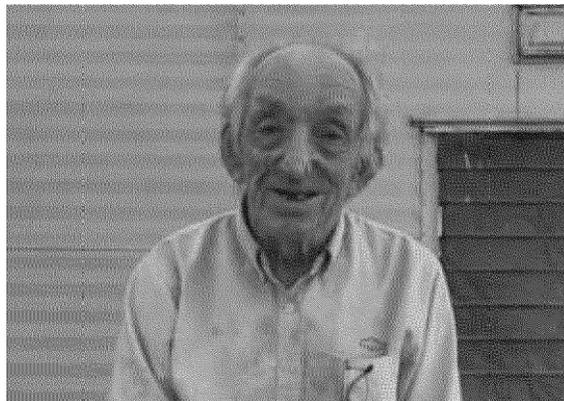
**Summary:** To be able to work together with the City of Warren and the City Council amicably so we can continue to make forward progress at Landmark Estates. To put an immediate stop to improper actions of the City Inspector causing homelessness of residents.

I felt it imperative to provide you with this detailed letter and full context, so that we could not only give "our side of the story", but also include as much factual and objective documentation as possible to support these statements. I appreciate you taking the time to review this information so we can continue these conversations.

There is a quote from your press release where you state, "Warren residents deserve to live with a good quality of life in safe housing and I will keep working to achieve that goal. " I truly believe we have the same initiative here: to ensure quality, affordable housing options are available for Warren residents who need it. It is my hope that we can work together going forward, and remove the division that has been created between us and the City of Warren, which only delays progress for the residents we serve. I hope that after you have a chance to review all of the documentation I've provided we can begin to have fruitful discussions that lead us in that direction. I look forward to sitting down with you in the near future to discuss these common goals.

Thank you,  
Michelle Oppelt

## Section 1: Resident Feedback and Testimonials



"I don't want to lose my home." -Murphy Gann

Murphy Gann, a Vietnam veteran and 14 year resident of Landmark Estates, along with dozens of other Landmark residents, asked us to share their testimonials and allow their voices to be heard. A full list of testimonials that residents asked us to share can be found below.

In a snapshot:

- 96% of residents gave us a positive review when asked how they felt about the progress at Landmark Estates over the past two years.
- 14 residents requested that we video tape their testimonials, in hopes they would be taken seriously. (Direct quotes from these video statements provided below.)
- 2 residents provided written statements, one of which had his statement notarized to verify the validity. (Copies of these written statements provided below.)
- Every resident we spoke to, including the only resident that gave negative feedback when speaking with us, said they do not want to see the community shut down and they want the opportunity for us to make continued progress at Landmark Estates.

In the press release that was published on the [senatedems.com/chang/](https://senatedems.com/chang/) home page on December 4, 2023, it was stated that, "For three years, Landmark Estates residents have experienced persistent sewerage issues, roof issues originating from fallen trees, and electrical outages from water leaking onto D TE circuit breakers. Residents have also feared retaliatory action from management after voicing their concerns."

We obviously take these kinds of accusations very seriously. Over the past two months, I have reviewed extensive documentation and spoken with the majority of our Landmark residents personally regarding all of these claims in order to determine what, if any, factual evidence there is to support the claims - and to see how we can rectify any issues that may still exist. While we, of course, would strongly disagree with the above statements, I didn't want to simply give you my opinion as a response. What I instead wanted to do, was to talk with as many residents as possible at Landmark Estates to determine what the true overall sentiment is at this time throughout the property. I wanted to determine if there are outstanding issues at the property that residents are upset or concerned about, so I could ensure they are corrected. I also wanted to find out if the majority of

residents agreed or disagreed with the negative statements made in this press release.

What we have discovered after speaking with residents directly, as well as conducting multiple resident polls (including an option to give feedback anonymously, so there could be no fear of retaliation if that was a true fear), is that the vast majority of resident feedback directly contradicts the statements made in the press release. What I, and many residents, fear is that the voice of a small minority of residents is being taken as speaking for the majority of the community. The overwhelming amount of evidence we have collected shows that is exactly what has happened at Landmark Estates.

Another quote in the press release states, "I believe change starts with uplifting the voices of our residents." I could not agree more, which is why I feel it was important to start this letter by including direct testimony and feedback from Landmark Estates residents, so all of their voices could be heard.

The feedback we have received and documented demonstrates that the overwhelming majority of residents are happy with the progress we've made at Landmark since we took over management at the end of 2021. 96% of the resident feedback was positive. Only one resident we spoke with gave negative feedback, but they had no current issues that we could address or resolve for them. The residents that had positive feedback have stated that they feel their voices are not being heard by the City, certainly not to the extent that the minority of residents making the negative claims about Landmark are being heard. They feel this is causing a lot of issues for them at the property and making them targets for the City Inspector. Many residents stated that they are afraid of the City of Warren trying to shut the property down, or that their home will get tagged by the City Inspector, as they have seen happen to so many of their neighbors throughout the community.

The source of these fears, as told to us from Landmark residents, stems from two main causes:

1 . At a city council meeting in 2022, the City Council declared that it planned to file civil nuisance litigation against Landmark Estates. During that meeting, it was stated by the Council that "this would be the first step in shutting the property down". City Council members were directly asked what would happen to the 50+ residents and their families who live at Landmark Estates, and who own their own homes located in the community, if the property was shut down. The response (which is a part of this publicly recorded meeting) was, "We don't know". After this City Council meeting, we entered into a written agreement created with the City of Warren which we were happy to put into writing, so the City, as well as our residents, would be aware of what we were committing to when it came to continued improvements at Landmark Estates. Since that written agreement was made with the City of Warren in early 2022, we have kept our end of the agreement and invested nearly \$580,000 in capital improvements and property clean-up projects at Landmark. Despite this substantial investment and adherence to the agreement, the negative press and accusations continue, without factual evidence provided to substantiate their accuracy. Our response to those claims, however, as found within this letter, includes a vast amount of documentation and evidence to back up our statements. The residents who responded to our polls and spoke with us directly are confused as to why the City continues to tag homes and threaten further action when they are seeing continued improvements being made at the property and they are happy with the progress.

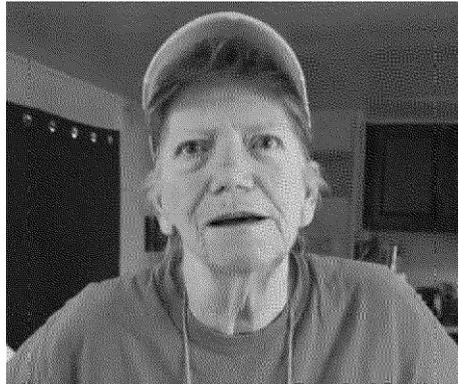
2. Over the past two years, since we have taken over management of Landmark Estates, one City Inspector (John Impellizzeri) has continually overstepped his authority and placed tags on homes which state them to be "unsafe structures" requiring demolition. This has been done by only taking a quick exterior look at the home and without listing any violations that can be given a timeframe to remedy (as required by the city ordinance). Many of the homes that have been tagged are homes that residents own not owned by Landmark Estates - directly displacing residents and causing multiple instances of homelessness, as detailed above in the Section Summary. Homes have been repeatedly tagged even after alerting Inspector Impellizzeri that the homes

are owned by residents and occupied. His verbal response to us was, "I don't care." Many residents have informed us that Inspector Impellizzeri will walk around the property regularly and ask them if they "think anyone lives there" pointing out neighboring homes. If Inspector Impellizzeri thinks they are vacant, they automatically get tagged - without any proper inspection process, without verifying if the home is actually vacant first, without listing out the supposed violations, and without following the process outlined in the city ordinance. We have also been told by multiple residents that Inspector Impellizzeri has been quoted as stating to them, "Don't you want to live somewhere better?", which has deeply offended many residents who take a lot of pride in their homes within the community. Inspector Impellizzeri has also made numerous verbal statements to residents, as well as our staff, that his intention is to have the park shut down, which further escalates the growing fear of being displaced amongst our residents. The clear and overwhelming feedback that we've received consistently from residents, as you will see in their testimonials below, is "we don't want to lose our homes" and "we don't want to lose our community".

\*I have provided photos of these tags that were placed without following the proper process within Section 4 of this letter. City Attorney, Ethan Vinson, has told our attorney, as well as stated to us in a recorded conversation, that the tags were indeed placed improperly by Inspector Impellizzeri, and he instructed us to remove the tags that had been recently placed. However, the issue has continued and Inspector Impellizzeri promptly came back and re-tagged the same homes, as well as additional homes, forcing more people out of homes they own, and again without following the proper process. This is unfair and unjust, especially to these resident homeowners who have rights that are not being honored by the City.

Since the residents we spoke with didn't feel their voices were being heard, many asked to have us record their testimonials. Fourteen residents asked us to video record their testimonials for documentation, one resident asked to put her statement in writing, and one resident chose to fill out an affidavit that they brought to their bank to have notarized so there could be no questioning of the validity of their signed statement. Here is what these residents had to say:

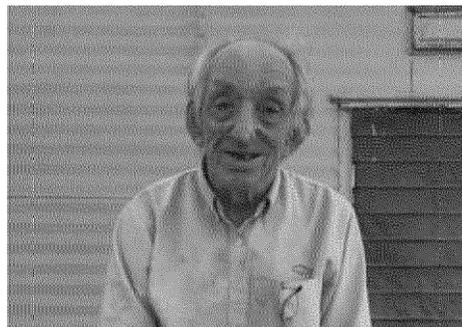
Sandra Hilligoss, Lot 125 (video testimonial):



"I've been here for about 3 years now. I lost my son a year ago, and I'm here by myself, and I can't afford to lose my home. I'm happy being here, and they have made improvements here.

I just don't want to lose my home. '

Murphy Gann, Lot 98 (video testimonial):



'My name is Murphy Gann, I live at 1996 Jarvis Avenue, lot 98, in Landmark Estates mobile home park. I have been here for 14 years. I own this trailer. I appreciate the management company that has come in. Before they came in, I had no water pressure at all, just barely a dribble. Now last winter they spent half the winter fixing the water and I have great water pressure now. They fixed a lot of the sewer lines where the sewer used to block up real bad. The old owners didn't do anything when I moved in here, and I would appreciate it if the city would give [the new managers] a chance to tell them and show them what they've done. They spent a lot of money here and I do not want to lose my home. '

Robert Devine, Lot 116 (video testimonial):

"I've lived here for roughly 13 years, but I grew up here for almost 40 years now. I love where I live. I love Landmark Estates. The new owners of the place have been taking such good care of it. They're doing everything they're asked to be doing of it. Nobody here wants to lose their house, and I most certainly don't want to lose my home. So, keep up the good work. They're doing a wonderful job here, and I hope the City and inspectors and everybody will continue to work with us and the owners of Landmark Estates, because I don't want to move. I'm staying. It's a wonderful place to live. '

Hannah Talik, Lot 52 (video testimonial):

"I have lived in Landmark Estates for about four years. . Since the new management has taken over, I've seen a number of improvements. Everyone, including myself, want to be here. We have a family here, it's a community. I don't want to see anyone have to leave. '

Madelyn Leva & Dalton Walters, Lot 45 (video testimonial):

"We don't want to go anywhere. Not at all. This is home, this is very much home. You guys are working hard to get things done. It's going to take time. '

Jennifer House, Lot 50 (video testimonial):

"I do not want to lose my place. There has been a lot of improvements, and when you need something done, it gets done. '

Joseph Orlando, Lot 95 (in a notarized affidavit):

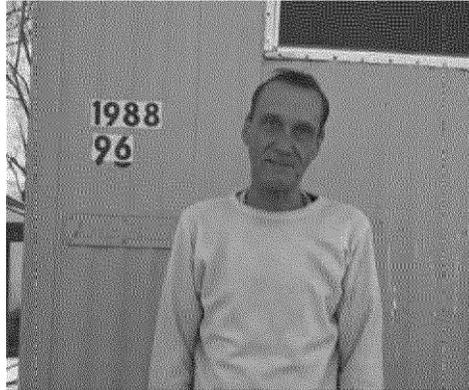
"I've seen much, much more work on this park and for this park than the other owner. I do appreciate the new owners and maintenance department. I and my 15 year old daughter live at this home. If I ever had a problem, I call the office that day or by next day it was addressed. I myself never had problems with my water or sewer. Dumpster area is always clean. Last year and this year they have put a lot of time and money into the park . I myself don't intend to move. I got this home for my daughter for when I pass on. Our problem here is the city, the city, the city. We have a good team here, problem city. '

Grace'lynnne Gaines, Lot 44 (video testimonial):



"I love staying here. It's quiet. It's beautiful. The people are friendly. I love it here. '

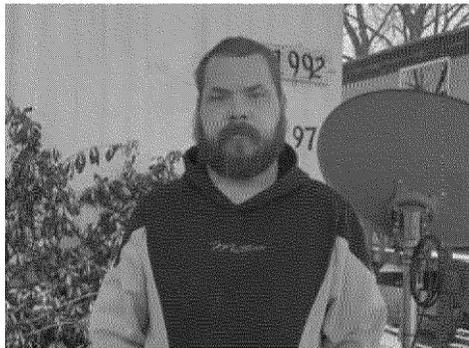
David Ridenour, Lot 96 (video testimonial):



"I am very happy with everything here, just like everybody else that I've talked to here.

I have no concerns at this time. '

Kevin Kelmar, Lot 97 (video testimonial):



"Everything js working fine here. The park is doing their job like they're supposed to. '

Mark Brown, Lot 77 (video testimonial):

"I have seen improvements at Landmark Estates. . . I would like to keep my home. '

Montez Cooper, Lot 37 (video testimonial):

"I do not want to lose my house. It's a nice area, and I would like to be here, and continue to do

Chantelle Mcrae, Lot 108 (video testimonial):

"I would like to see the park stay open. '

Patrick Gaughan, Lot 124 (video testimonial):

"They have been improving everything here, and we're happy with it here, and we'd like to keep our homes. '

Eryn Hopgood, Lot 81 (video testimonial):

"They are making improvements and trying everyday to make it a better place to live. '

Terrell Baker, Lot 36 (written statement provided to us):

"I do not want to lose my home. Don't shut down my community. '

Resident who requested to stay anonymous (verbal statement provided to us):

"I don't want to lose my house. This js a nice area and I would like to continue to be here. '

## Section 2: Capital Improvements Completed at Landmark Estates

As a professional property management company, my team (at Open Management

LLC) oversees the daily progress, as well as long term and large scale projects, at Landmark Estates. Our number one priority is to ensure our residents have a safe and quality affordable housing option available to them within our community. When we took over management of Landmark

Estates in the fall of 2021 , there were many deferred maintenance items left from the previous owner(s) that we were, and continue to be, dedicated to improving and correcting. Over the past two years, we've invested nearly \$580,000 into capital improvement projects at Landmark Estates as a part of our

.'revitalization plan" for the community (a full, itemized list of these capital investments is included below). We've made major upgrades to the water and sewer infrastructure at the community, completed extensive tree work, conducted multiple large scale "clean up" projects where we provided residents with free junk removal and dumpster services, contracted a licensed pest control company to eradicate the rodent infestation that was present when we took over, completed road repair projects and resealed the asphalt, and torn down 27 old and unsafe homes that needed to be removed. We spent hundreds of thousands of dollars in our first 24 months of managing Landmark Estates, and we plan to continue investing in the community if we can overcome challenges experienced while working with the City of Warren. Since taking over management of Landmark Estates two years ago, we have unfortunately expended over \$10,000 on legal fees associated with unnecessary battles with the City. These resources could have been spent in advancing the timeline on our planned capital improvements at the community.

Outlined on the following page is a complete list of the capital improvement projects completed thus far under our management of Landmark Estates (this is above and beyond any regular and recurring monthly operating expenses):

## Capital Improvements

Property: Landmark Estates (LME MHP LLC )

Detail 08/20/21 12/07Æ3 (accrual basis)

Date

Description

Invoice Payment

10/21/21	The Davey Tree Expert company capex	expense	3.45000
01/27/22	Jennfs Tree Service Tree		g,50££00
	Jenny <sup>8</sup> 3 Tree Service Tree work		12.50000
02/17/22	Lenny's Home Services Excavated lot and %ocated sewer main		204800
03/23/22	Dra\n Resoivers LLC Hydro jet all 110 trailer sites (from traiterto main)		89000.00
03/28/22	Lenny\5 Home Services : Sewer upgrades		2969200
04/01/22	Jennfs Tree Setvice Tree trimming and temoval		4600.00
05/02/22	Scott Conrad: Demolition of unusable homes		
05/15/22	Chase VISA WSM :		2.95000
7/22	Difiniti Piumbings & Drain sewer scoping		21530.00
05/18/22	Chase VISA : Lenny}\$ Home Services: deared roots, sewer lne jetting		7269 45
05/19/22	L & J Removal Init Demolition of unusable homes		5,500 goo
05123122	Difiniti Piumbingx Sewer, & expense for the materials to *tart a maloc sewer upgrade project at LME		
06/08/22	Digging at bt 50 & installing a new line		2995000
0B* 8/22	Junk Starz LLC: Free Bulk Trash Removal for Residents		1\$64.00
0B124/22	Difiniti Plumbing, Sewer, & Drain Mobilization for sewer project		4382400
08/26/22	Lowes Paving, and Concrete : Asphalt repair(seak coat		172450.00
08/30/22	Difjniti Plumbing, Sewer, & Drain sewer upgrade project		J468,00
09/11/22	Difinfiti Plumbkng Sewer\ & Drain sewer upgrade project		gu851.oo
	%LL, Wamer Repair : demolition Of unusable homes		110000800
09/18/22	Chase VISA WSM Roto,, Rooter		
09/16/22	Chase VISA - WSM Roto-Rooter		
09/20/22	Essex T!tle: Title searches to help residents obtain titles not provided by previous ownership		
10/03/22	Wamer Repair ; demolition of unusable homes		
	AMEX OOC Detroit Mt Signs and Madison: New Signage for propegty		351.17
10/10/22	AMEX OOC Oetroit MI Signs end Madison: Final Pmt* Sign for property,,		351,17
	L & Removal Inc : Demolition ot unusable homes		109000.00
11?14/22	A & E ANYTIME PLUMBING INC ,, Excavate sump riser for domestic water 1/2" gaivankzed down wate[ main,, Upgrade as needed.Re,, instalk sump f"iserq Backfill to rough grade		3600.00
0320/22	WSM Title: seatenes residents obtain titieg by praetous twnership Wamev Repai/' 01 unusable		

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	Epcf Concrete. LLC Road repairs after marqtoV,e	{50% down)		14395.0
l	paymrnt)			0
i	Epc ConcreieLLC Road repairs after	('final payment')		2L340.oo
n	Anytime Plumbing sewet' system			
e	AAE Anytime Piumbmg Inc: wale: tkne			3000
u	3,495C)			0
p				2,750
g				M
r				2550M
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d				et784,,e5
e	2-aaam			
			total:	579,140.81

### Section 3: Updates sent to residents, City Officials, and Council Members to keep them looped in on progress being made at the property

Over the past two years, we've provided both our residents, as well as the City of Warren, regular and routine updates regarding the progress we've been making at Landmark Estates. When Councilwoman Angela Rogensues initially reached out to us to voice concerns over negative feedback she had received from a couple of residents at Landmark (in early 2022), we were happy to hop onto a Zoom meeting with Councilwoman Rogensues and others to discuss these concerns. We also added all City Council members (including Councilwoman Rogensues), and many of the City Officials at the time, to our routine email correspondences that went out to residents so everyone could be looped into all updates at Landmark

Estates. However, after the City Council publicly declared that they planned to begin litigation against Landmark Estates (at the end of 2022), Councilwoman Rogensues told us that she could no longer communicate with us directly, and that further communication would need to go through attorneys. At that point, we removed Councilwoman Rogensues and the other City Council members from these email updates. I've included some examples of this correspondence that we had been routinely emailing to the various City Officials previous to being asked to no longer communicate with Council Members directly:

The first two examples below show the types of routine communication that went out to residents to remind them of the various ways they can contact us if they have any issues or need any assistance (including anonymous options in case there was any merit to claims that residents feared retaliation for voicing their concerns to management):

## Landmark Estates

Mobile Home Community Warren MI

Dear Residents of Landmark Estates.

We appreciate having you as a valued member of our community! We have a full team of property managers and account specialists that are here to serve you as a resident

Below is a helpful reminder of the various ways to contact us, should you ever have any questions, comments or concerns to share with us.

If you prefer to contact us anonymously, we have an option for that as well!

If you prefer to speak with someone in person Christian Werther is your on-site Community Manager and is always happy to help. If he's out and

about handling various projects or speaking with other residents and you don't see him in the office just reach out using one of these methods below in order to set up an in person meeting.

We also have monthly tenant "meet and greets" and we hope to see you there as well!

How can I contact the property management team at **Ectafen**

Phone Number: (586) 473-5126

Email: [landmarkestates@openmgmt.com](mailto:landmarkestates@openmgmt.com)

Link to fill out a contact form: [LandmarkCares4U.com](http://LandmarkCares4U.com) If you prefer to leave anonymous feedback you can use this link and put "anonymous" in the name and tot number fields.

We look forward to best serving you and hearing from you soon!

Thank you.

Landmark Estates Team

**Landmark Estates**

## Resident Notice: Park Phone Number and Water/Sewer Repairs

Dear Residents,

We appreciate our tenants who have brought to our attention some issues they have been experiencing at Landmark Estates\* Notifying us directly gives us the opportunity to correct issues on the property as quickly as possible so we thank those who have notified us.

We would like to assure all of our residents that we take these issues very seriously, and we appreciate the opportunity to address and correct any questions or concerns our

residents may have. It is our mission to improve upon the community and make it an even better place for our residents to live under our ownership.

### Who do I contact if I have questions about my account or have a maintenance request?

Please know that you can contact our management team anytime you need assistance. We have team members available at our Resident Help Line to answer calls from residents daily Monday-Saturday (and monitored Sundays for emergencies). If you have any questions regarding your tenant account, or maintenance issues that you need assistance with, please call our Resident Help Line and leave a message explaining your question or request. Our team member who is the most appropriate person to address your question or request will then return your call as quickly as possible to assist you.

Resident Help Line: (586) 473-5126

### What if I'm experiencing issues with my water or sewer lines?

Please know that we are aware of issues that have occurred with some of the water and sewer lines at the park, and we are working diligently to correct these issues. All sewer lines have been recently jetted to remove obstructions, and we are scoping the lines to determine if additional repairs or replacements to the lines may be needed. We have also repaired water lines at the park, and will continue to do so to ensure everyone's water lines are functioning as they should be. If you are experiencing any type of issue with your water or sewer lines, or have any other maintenance request that needs to be addressed, please contact our Resident Help Line above, and we will be able to put a work order in place to correct any issues that arise.

---

Landmark Estates

Below is an example of the additional emails we would send to city council members 1-2 times per month to keep them updated on the

progress being made at Landmark Estates (the example below was sent on Dec 2, 2022):

Sent To: Angela ([angeLa@cLYQfw-arugnug](mailto:angeLa@cLYQfw-arugnug)), <sup>Caitlin</sup>([cmurphy@cityofwarren.org](mailto:cmurphy@cityofwarren.org))  
CC: John ([jimpellizzeri@cityofwarren.org](mailto:jimpellizzeri@cityofwarren.org)), ([green@cityofwarren.org](mailto:green@cityofwarren.org), [gwatts@cityofwarren.org](mailto:gwatts@cityofwarren.org), [mindy@cityofwarren.org](mailto:mindy@cityofwarren.org), [jilafferty@cityofwarren.org](mailto:jilafferty@cityofwarren.org), [ronpapandrea@gmail.com](mailto:ronpapandrea@gmail.com), [ekabacinski@cityofwarren.org](mailto:ekabacinski@cityofwarren.org) )

Subject: Landmark Estates Project Updates 12/2

Good afternoon Caitlin and Angela,

I hope you both had a great week! Similar to the bi-weekly updates we've been providing for prior months, we wanted to follow up again to provide further updates on our revitalization progress at Landmark Estates. We would also like to again reiterate our desire to schedule a meeting with the city to discuss our recent progress and address any of the city's ongoing concerns. Please let us know if you and/or other representatives would be open to this and we can accommodate your schedules. More updates below!

- Resident Communication — Our December newsletter has been distributed to our residents and has been included in this email for your review. You'll see our team has planned a few events this month, including an upcoming holiday gathering. Our offsite and onsite teams have reported some great feedback from residents who are sharing their appreciation.
- Onsite Security — Our team has initiated services with Elite Shield Security for the patrolling of our community. Their services officially began on December 1st and the team's objectives will include periodic community patrols, monitoring community activity, onsite building inspections to ensure any vacant units are secured, and more.
- Titles — Our team continues the distribution of titles from the previous owners and we have been working with residents as much as possible. Several residents have expressed their frustrations with regards to the unknown ownership of their mobile home which were purchased prior to our ownership. Our attorney has made several suggestions and we are working individually with each resident to ensure they have the guidance and support on how to receive their title.
- Staffing Updates — Our team is always looking for motivated individuals that take ownership and show care in the improvement and stabilization of our communities. Because of this, we have opened on-site maintenance positions and will be working

through a list of candidates to ensure we find the right person for this important and critical role. Our goal is to ensure all team members have the mindset, training and drive to take care of our residents and community. ● Winterization & Snow Removal Services— The team has been working through our winterization checklist to ensure all common areas and vacant lots are ready for the winter months. Cameron and I will finalize our checklist next week and will complete a thorough inspection before concluding the preparation. Snow removal services have been pre-scheduled for the season and the team at Lincoln Property Maintenance will monitor the weather and take lead on this service for our roads at Landmark Estates.

- Landscape & Vacant Lots: The team has recently removed all of the leaves at Landmark and has also recently engaged a contractor that will edge and remove the weeds and shrubs throughout the community. Vacant lots have also been a priority as we have completed the

removal of cinder blocks and will be working through the removal of any rubbish or larger items that may be surrounding vacant lots.

- Home Site Clean Up Efforts- One challenge that we have been facing is the lack of maintenance and cleanliness of some of the resident owned home lots. While we have seen improvements and cooperation from several residents, we still have difficulty with the lack of cooperation in some cases. Our team has been understanding of the unfortunate conditions that were left behind by prior owners and we are working with every resident to assist them with the rubbish removal and lot clean up process. We are giving the residents an additional 30 days to clean up their home sites and will then proceed with issuing violations to ensure the aesthetics of the community continue to improve.
- Demolition and Clean Out of Vacant Homes — Our team has gathered a list of the homes that have been demolished under our ownership have included them in detail below. The demolition contractor has 2 additional homes that will be removed by Friday, December 9th. Our plan is to continue demolition plans through the month of December and into January.

- 1 . 1916 Jeannie Ct Lot 1
2. 1920 Jeannie Ct Lot 2
3. 1924 Jeannie Ct Lot 3
4. 1934 Jeannie Ct Lot 6
5. 1946 Jeannie Ct Lot 9

6. 1968 Jeannie Ct Lot 15
7. 2078 Jeannie Ct Lot 38
8. 2096 Jeannie Ct Lot 41
9. 2108 Jeannie Ct Lot 43
10. 1929 Jarvis Avenue Lot 57A
11. 1995 Jarvis Avenue Lot 71
12. 2076 Jarvis Avenue Lot 112
13. 2084 Jarvis Avenue Lot 113
14. 2144 Jarvis Avenue Lot 121
15. 2198 Jarvis Avenue Lot 128

- Pest Control — The regular treatments throughout the park are continuing with bait stations being checked twice per month and replenished with bait as needed. The intensive bait and snap trap abatements for homes that are scheduled to be demolished are in effect to reduce rodents disbursing to nearby units. Orkin also responds quickly after a home is removed to treat any burrows that may be located on the newly vacant lot. Additional units will be added based on the schedule/availability of the demolition crew.
- 2023 Plans & Projections- Our team would like to conclude this email with important information on our next steps and plans for the new year. As you know, the deferred maintenance from prior ownership delayed the progress of our revitalization efforts and now that we have accomplished some of the larger safety-related projects, our focus will include the beautification of our community including sidewalk repairs & replacements, landscape additions, a designated resident courtyard area and more. As always, will continue to provide updates as we continue our efforts.

Please feel free to reach out to us should you have any questions or concerns.

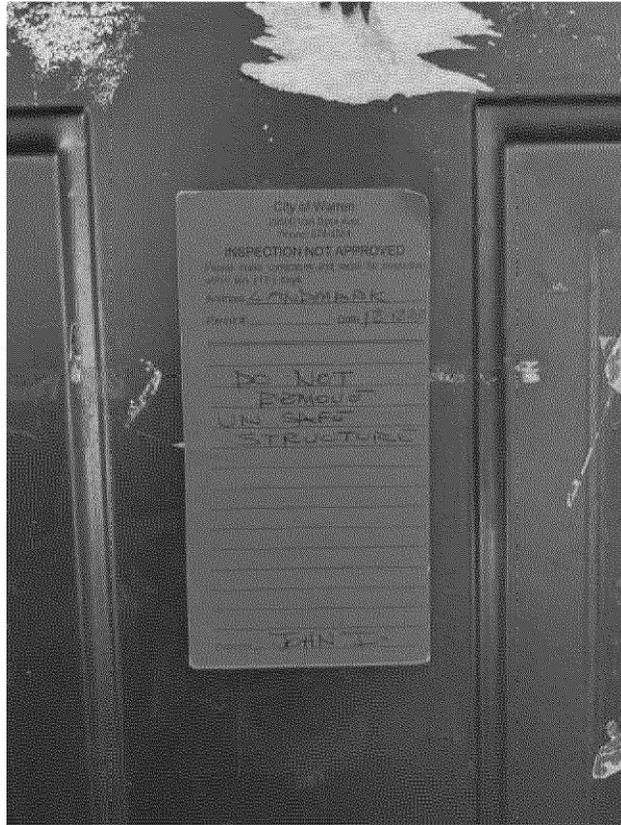
Have a great weekend,

Mary Lopez (Regional Property Manager, Open Management)

## Section 4: Improper tagging of homes by the city inspector

At a recent Warren City Council meeting (in December 2023), our Senior Project Manager, Cameron Asam, spoke with Warren City Attorney, Ethan Vinson, to alert him that City Inspector, John Impellizzeri, was again back at Landmark Estates improperly placing tags on homes throughout the property. Mr. Vinson advised our project manager during this conversation (which we have a recording of) that the tags were indeed placed improperly and should be removed. Mr. Vinson also stated this to our attorney in a phone conversation a couple weeks before the City Council meeting. We removed the tags as advised by the City Attorney. However, within days, City Inspector Impellizzeri came back to reapply the tags, as well as add tags to additional homes. Residents are confused by these actions being performed by a City employee, especially after the City Attorney, the former Mayor, additional City employees including Inspector Impellizzeri's bosses, and City Council were all made aware of his actions and all agreed these tags were being imposed improperly, but nothing has been done to put a stop to him. Residents are extremely fearful of losing their homes and being "next on the list".

Here are a couple examples of the most recent tags that were placed on homes without following the proper legal process outline in the city ordinances:



The tag in the second photo cites "Ordinance 80 625, Chapter 9, Article 2, Section 9-165. In the city ordinance, the following is stated:

"Sec 9-157. Placarding.

- (a) Whenever a dwelling, dwelling unit or rooming unit has been condemned in accordance with section 9459, the code official, health officer or designated representative shall post, in a conspicuous place or places, a placard or placards bearing the following words:  
"Condemned As Unfit For Human Habitation ' , "

The above has not been followed on any of the tags placed on the homes at Landmark.

"Sec 9-158. Vacating,,

Whenever it shall be found by the code official, health officer or designated representative that a dwelling, dwelling unit or rooming unit is unfit for human habitation the official shall order the dwelling, dwelling unit or rooming unit vacated A copy of the order shall be posted on the front of the dwelling at least ten (10) days before it shall be effective, unless the situation requires immediate action, in which case the effective time of the order shall be that which the code official, health officer or designated representative determines is reasonable and proper A copy of the order shall be served in accordance with section 9460\* ' ,

The tags placed on homes have never included 10 days notice, nor been served in accordance with Section 9-160 (below),

"Sec 9-159. - Notice of condemnation

Whenever the code official, health officer or designated representative determines that a dwelling, dwelling unit or rooming unit is unfit for human habitation and posts it condemned, the code official, health officer or designated representative shall provide written notice of condemnation to the owner, agent, or occupant For mobile homes, written notice of condemnation shall be provided to the owner of the mobile home, owner of the mobile home park, agent, or occupant The notice of condemnation shall include the address of the property, the date of the inspection, the name of the inspector the rounds for the determination as unfit for human habitation and a complete statement of the rights of the occupant

ant or owner to a hearing before the hearing officer defined in section 9469 and the procedure to request a hearing.

(Ord. No. 80-625, 3, 3-14-06; Ord No. 80-756, 2, 5-9-17)"

Notices of condemnation have never been provided to the homeowners, or to us. This section is clearly being violated by simply sticking an orange tag onto homes stating "unsafe structure" with absolutely no details including the address of the property, grounds for determination, complete statement of the rights of the occupant or owner to a hearing, etc. None of these procedures listed in the City Ordinances are being followed by the City's own employee,

What has been happening is that Inspector Impellizzeri comes to the property, takes a quick visual look at the exterior of a home, and if he feels compelled to, he places an orange tag onto the home (regardless of whether or not its occupied) and claims it to be "unsafe" without following any of the regulations listed in the City Ordinances. The City of Warren, including the City Council, has been aware of this for the two years that we've managed Landmark Estates, and there has been no corrective action taken to dates This is extremely concerning to us as well as the residents and homeowners within our community at Landmark Estates.

Below is an email that was sent to City Council Members on December 16, 2022 (more than a year ago), which includes a notice to the City Council that Inspector Impellizzeri was tagging occupied and resident owned homes, forcing people out of the homes they own and displacing them. This email also let the city council members know that we had received an email from a single mother who had been forced out of her home and was homeless for months due to her home being tagged by the City Inspector:

Sent To : Angela ([angela@cityofwarren.org](mailto:angela@cityofwarren.org)), Caitlin ([cmurphy@cityofwarren.org](mailto:cmurphy@cityofwarren.org))

cc : LimpellzzeL@Qt-YQfuaceL-er-g, guatts@ALupuacengg,  
rgnpapandrea@gmail.com, ekabacinski cit ofwarrenxor

Subject: Landmark Estates 2022 Recap

Good afternoon Caitlin and Angela,

I hope you both had a great week! As you know, our team has been in communication throughout the year to keep you informed of our revitalization initiatives at Landmark Estates. To wrap up the year we wanted to include a brief 2022 recap in this update.

We purchased this distressed property in August of 2021 with the intention to correct deferred maintenance issues from previous ownership and bring this community back to life. Our initial business plan included large capital projects and various property improvements, most of which were completed in 2022. Unfortunately, multiple homes were tagged as unsafe with an immediate demand to remove/demo, which delayed our progress given that these homes were owned by residents. Most concerning was that a number of the homes that were tagged were actually occupied. Our team recently received an email from a previous resident that had her home tagged while living in it. She came home in March to find her home marked as an unsafe structure and was forced to leave her home behind. She claims to have lost thousands of dollars to a vendor (who had done work on her home) and was homeless with her children for 3 months due to the tagging of her home. Our number one priority, as we continue our efforts to improve the community, is to not displace residents who need this affordable housing so desperately, and who have spent money purchasing their homes and deserve to continue to live in them.

During our 15 months of ownership, our team has invested over \$365,000+ on capital improvements alone (summarized below). And this is excluding ongoing operational and maintenance expenses which are significant.

- \$218,000 on sewer line replacement and repairs
- \$51,900 spent to demolish 14+ vacant homes and remove them from the property, clean the lot, and repair any utility lines as needed
- \$30,000 on tree trimming and removing tree hazards
- \$15,000 spent on landscaping and groundskeeping

- \$8,400 spent on trash/junk removal - including removing junk and debris from residents' individual lots at no cost to them (typically a responsibility of the tenant to maintain a clean lot)
- Plus \$40K+ on a variety of other CapEx projects including road repair/resurfacing, pest control, community maintenance, and home repairs.

I personally got to spend time with the residents while I was in town last week for our resident dinner and I was able to see the difference and their gratitude for work that our team has already done. The residents feel appreciated and are showing interest in doing their part to continue these efforts.

Everything our team is doing is in alignment with our initiative to revitalize this community and provide desperately needed affordable housing in Warren. We're discouraged by the lack of response to discuss our efforts and willingness to work together on a plan that will help this community. However, please know that our team is fully committed to Landmark Estates and is available to meet at your convenience.

Additional plans are to follow for 2023 and we will continue to provide updates as we progress with our revitalization initiative. However, should you want to discuss further or arrange a meeting, please do not hesitate to reach out to us.

Hope you have a Happy Holidays!

Mary Lopez (Regional Property Manager, Open Management)

## Section 5: Our hopes for moving forward

It is our hope that moving forward we can have productive conversations with not only our residents, but also with City employees and elected officials at both the local and state level that will move us all forward in our common goal of providing safe and affordable housing options for our residents. The division that has been created, especially at the city level, has directly hindered us from being able to make continued progress for our residents at Landmark Estates. It is our hope that the voice of the majority of our residents at Landmark Estates will be heard and valued. It is our hope that City officials will follow their own rules and not abuse their authority leading to additional resident displacement and homelessness. Finally, it is our hope that forward progress can come from these conversations that we look forward to having with you and other elected officials that are willing to sit down with us as we work toward our common goal. I appreciate you taking the time to thoughtfully consider the information included in this letter, as it is critical for making progress going forward.

# Exhibit C

Asher, K le

From: Brenton Chandler  
<bcc@chandcap.com>  
Sent: Friday, October 10, 2025 11:52 AM  
cc: Hanselman, Jason; Kirk Rehn  
Subject: Re: Questions from our Call

CAUTION: External Sender

Report Suspicious

Verify sender before opening links or files

Following up on our prior correspondence regarding the permit application and building department issues. It has been a month since this email and I have received no response from the building department.

Mr. Rehn has not returned any of my calls or emails since August despite his denial letter of our permit application indicating to call with any questions. This prolonged lack of communication is preventing Twin Pines and Landmark Estates from completing planned improvements and is causing escalating financial harm each day.

Please advise when we can expect a formal response from the building department.

Thank you,

Brenton Chandler  
Chandler Capital LLC  
510 Bering Dr. Ste. 620  
Houston, TX  
77057 P: (281)  
777-9992  
[www.chandca.com](http://www.chandca.com)

On Sep 10, 2025, at 4:08 PM, Mary Michaels <mmichaels@cityofwarren.org> wrote:

Thank you, Brenton. I am following up, but realistically do not expect an answer until next week (hopefully early).

I certainly understand cost- issues but wondering if you'd like me to reach out to Jason on a few of the matters

Mary Michaels  
Chief Assistant City Attorney  
City of Warren  
One City Square, Suite 400  
Warren, Michigan 48093  
(586) 574-4585

From: Brenton Chandler

Sent: Wednesday, September 10, 2025 2:56 PM

1

To: Mary Michaels <mmichaels@cityofwarren.org>

Subject: Questions from our Call

Mary,

Thank you for being so generous with your time today. Here are the three questions I'm hoping for clarification on:

- Shifting Standards - a permit for 1924 Jarvis was approved in 2023 by Kirk Rehn. Eight weeks ago, we applied for a new infill permit for 1924 Jarvis (as the 2023 home was never brought in) and the application was declared deficient by Kirk Rehn due to various violations of the Michigan Residential Code and a lack of site plan on file. Question: what changed between 2023 and 2025 that justifies the different treatment of an application that was previously approved - by the exact same inspector, in the exact park, on the exact same lot, under identical circumstances?
- Michigan Residential Code: In his response, Kirk Rehn issued seven items needing correction. All seven referenced the 2015 Michigan Residential Code. The MRC explicitly states "These provisions shall be applicable only to a manufactured home used as a single dwelling unit installed on privately owned (nonrental) lots." (MRC

201 5, Appendix E, S AE 101 ), Question: Given that this language expressly excludes rental communities and licensed manufactured housing parks, please explain why the City is applying the MRC as the governing standard for homes in Landmark Estates and Twin Pines, both of which are licensed manufactured housing communities—not privately owned non-rental lots?

- Water/Sewer Infrastructure: As part of his response, Kirk Rehn cited the absence of a written plan to improve the water and sanitary sewer systems as a reason our application needed correction. Question: Given there are no current water/sewer issues or active citations from the City, how is the absence of a future improvement plan a valid basis for denying or delaying a permit to infill a home?

Thank you,

Brenton Chandler  
Chandler Capital LLC  
510 Bering Dr. Ste. 620  
Houston, TX  
77057 P: (281)  
777-9992  
[www.chandca.com](http://www.chandca.com)

Asher, Kyle

From: Brenton Chandler <bcc@chandcap.com>  
Sent: Tuesday, September 2, 2025 6:18 PM  
To: Mary Michaels  
cc: Hanselman, Jason  
Subject: Re: Twin Pines Site Plan  
Attachments: Completed Building Permit Application (1)  
(l).pdf

CAUTION: External Sender

Verify sender before opening links or files

Re ort Sus icious

Yes, this application was submitted in June to the planning department and building department. I understand and appreciate the concern regarding setbacks between homes; however, the building permit application itself already requires the applicant to draw and certify the proposed setbacks (attached). As the owner, we would, of course, bear the cost of remedying any issue if a home is ultimately placed in violation of the legal setbacks.

A few additional points merit consideration:

1. Past Permitting Practice — It is my understanding that the City has issued permits to other communities without a site plan on file in recent years. For example, a permit was approved to bring a home into Landmark Estates in 2023 under prior ownership. Although the home was never installed, I later applied for a permit on the exact same lot under the same conditions (attached), and that application has been ignored without explanation.
- 2, City Code Requirements — The City's own municipal code requires a site plan only in the context of constructing a mobile home park. This application is not for the construction of a

new park, but simply the placement of a replacement home within an existing, legally established community.

3. Grandfathering Under State Law — Finally, MCL 125.2307 makes clear that mobile home parks are grandfathered to the standards in place at the time of their original construction. There was no site plan requirement at that time, and therefore such a requirement cannot be enforced retroactively against this community.

Thank you,

Brenton Chandler  
Chandler Capital LLC  
510 Bering Dr. Ste. 620  
Houston, TX  
77057 P: (281)  
777-9992  
[www.chandca](http://www.chandca.com)  
[.com](http://www.chandca.com)

**REAR**

Jeannie Court

13ft

FUTURE HOME  
(LOT 56)

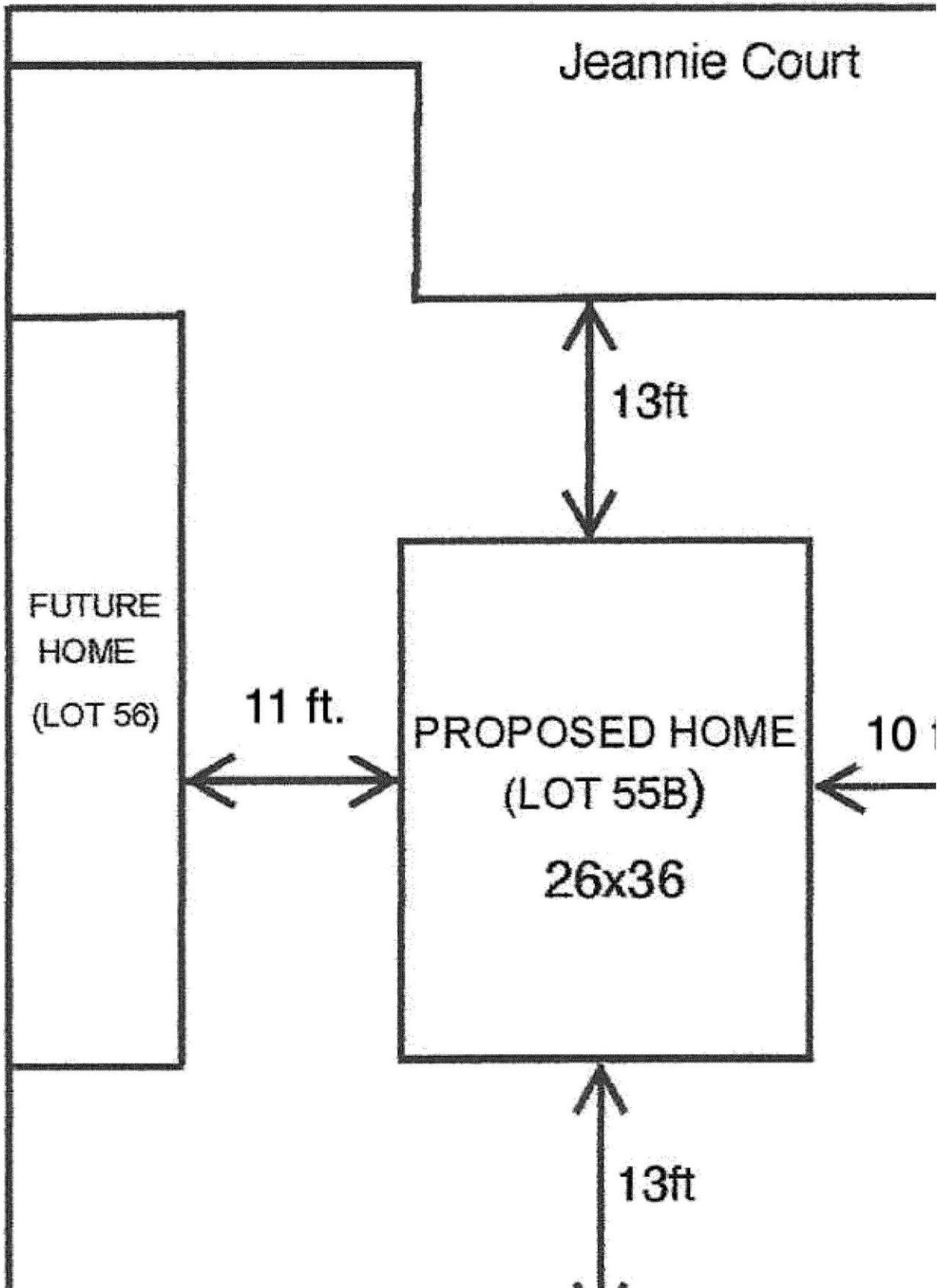
11 ft.

PROPOSED HOME  
(LOT 55B)

10 ft

26x36

13ft



On Sep 2, 2025, at 3:59 PM, Mary Michaels <mmichaels@cityofwarren.org> wrote:

Thank you, Brenton

Did you submit this to our Planning Department? I'll call Planning this week to discuss the process

I believe I understand the perspective of Building when reviewing the home sites - a base line is needed to determine the distances between homes.

Let me get some input from Planning on your site plan

Thanks

Mary Michaels  
ChiefAssistant City Attorney  
City of Warren  
One City Square, Suite 400  
Warren, Michigan 48093  
(586) 574-4585

---

From: Brenton chandler<[bcc@chandcap.com](mailto:bcc@chandcap.com)>

Sent: Tuesday, September 2, 2025 5:08 PM

To: Mary Michaels<[mmichaels@cityofwarren.org](mailto:mmichaels@cityofwarren.org)>

Subject: Twin Pines Site Plan

Hi Mary,

As promised, please find the attached site plan, which was submitted to the city in June. John Impellezzeri has verbally acknowledged its receipt, but we have received no written response documenting its specific deficiencies.

I'm being told by the building department I cannot bring in homes because we have no site plan on file. The department refuses to respond to or acknowledge my permit applications to bring in homes, despite the fact a site plan is not a prerequisite to bring in homes. We spent \$8,500 on this site plan, submitted it, and have received zero feedback.

Thank you,

Brenton Chandler  
Chandler Capital LLC  
510 Bering Dr. Ste. 620  
Houston, TX  
77057 P: (281)  
777-9992  
[www.chandca.com](http://www.chandca.com)

3

Asher, K le

From: Brenton Chandler <bcc@chandcap.com>  
Sent: Tuesday, September 9, 2025 8:56 AM  
Kirk Rehn  
cc: Mary Michaels; Hanselman, Jason  
Subject: Fwd: Twin Pines - Regulatory Requirements  
Attachments: City of Warren Permit Application Repsonse.pdf; 4-28-2023 Permit Approval Email.pdf; Completed Building Permit Application (1) (l).pdf; 2025 Application.pdf; 2023 Application.pdf; MCL-125-2307 2.pdf; MCI-125-2307.pdf

CAUTION: External Sender

Verify sender before opening links or files

Re ort Sus icious

We received your response to our permit application at 2415 Jarvis. I have a few questions that would like clarified:

Michigan Residential Code: As outlined in my original email below, the Michigan Residential Code explicitly states it applies only to mobile homes placed on privately owned lots. Please identify the specific legal authority that allows the City to extend MRC provisions to homes in a licensed manufactured housing community.

Prior Approval on Same Lot: I've attached an email from you, Kirk Rehn, approving a home on the same lot and same park in 2023. Given that you personally approved this same lot in 2023 under identical circumstances, can you explain why, in 2025, the City has imposed new requirements so burdensome that they amount to a constructive denial of the application? Please also provide evidence that any new or more stringent requirements were filed with and approved by the Michigan Manufactured Housing Commission, as required by MCL 125.2307. I've attached the permit application and approval from 2023, the permit application from 2025, and an email from you from 2023.

Water & Sewer Issues: Your response references "water and sanitary sewer issues." Between myself and prior ownership, more than \$500,000 has been invested into water and sewer system upgrades at Landmark Estates. We are not aware of any outstanding issues. Please specify what problems you believe exist.

Consistency of Enforcement: Other manufactured housing communities in Warren have reportedly received permits without being required to submit site plans. Please explain why Landmark Estates and Twin Pines are being subjected to different standards. If different standard are being applied, please identify the legal authority for doing so. Additionally, MCL 125.2307 requires that any higher or more stringent local standard be filed with and approved by the Michigan Manufactured Housing Commission before it can be enforced. Please provide

evidence that the City's asserted 'site plan' requirement for placement of replacement homes in existing communities was ever filed with, reviewed by, and approved by the Commission.

Our application was submitted on July 9, 2025, yet no response was provided until September 3, 2025 - nearly eight weeks later. An eight-week delay in even acknowledging a permit application is unreasonable, unacceptable, and constitutes obstruction of lawful housing activity. At a minimum, the City has an obligation to process applications in a timely manner, or to promptly notify applicants of any deficiencies.

The City's approach has imposed a significant human cost and prevented us from expanding the supply of affordable housing. Warren faces a desperate need for affordable housing, and every month of delay and obstruction prevents numerous families from moving into safe, high-quality homes. This obstruction directly harms the most vulnerable and at-risk residents of Warren. Restricting the supply of affordable housing serves neither the City nor its residents—it is a stance without logic, without compassion, and without benefit.

Sincerely,

Brenton Chandler  
Chandler Capital LLC  
510 Bering Dr. Ste. 620  
Houston, TX  
77057 P: (281)  
777-9992  
[www.chandcap.com](http://www.chandcap.com)

Begin forwarded message:

From: Brenton Chandler <bcc@chandcap.com>

Subject: Twin Pines - Regulatory Requirements

Date: August 28, 2025 at PM CDT

To: Kirk Rehn <krehn@cityofwarren.org>

Cc: Mary Michaels <mmichaels@cityofwarren.org>, "Hanselman, Jason"  
<JHanselman@dykema.com>

Kirk,

Following up on our phone call this afternoon, I am once again requesting the specific city, state, or federal ordinance that requires a pre-inspection for cosmetic repairs such as painting and flooring, as you indicated would be required of homes at our community moving forward.

You cited the Michigan Residential Code, Appendix E. However, the very first sentence of Appendix E itself states that it applies only to "a manufactured home used as a single dwelling unit installed on privately owned (non-rental) lots." Here's a link if you'd like to verify: <http://upncode.com/viewer/michigan/residential-code-2015/chapter/E/manufactured-housing-used-as-dwellings#AE101>

[residential-code-2015/chapter/E/manufactured-housing-used-as-dwellings#AE101](http://upncode.com/viewer/michigan/residential-code-2015/chapter/E/manufactured-housing-used-as-dwellings#AE101)

All homes in my community are situated on rental lots, not privately owned non-rental lots. Accordingly, Appendix E does not apply. Unless you can provide an ordinance expressly adopted by the City that expands Appendix E to cover rental-lot manufactured homes, there appears to be no authority for your requirement. I've also attached MCL 125-2307 for reference, which makes clear that local inspection authority applies only when a mobile home itself is being rented to a tenant by its owner. As I have reiterated, these homes are not being rented.

Further, many of the so-called "violations" spurring a second stop-work order (once again issued without proper placarding or written notice, but instead delivered verbally and without specific citations as required by the City's own code) are derived from the Michigan Residential Code—such as a 3x3 stair landing—that our community is not subject to. I am looking specifically to the Warren Municipal Code, the Michigan Mobile Home Commission Act, and the HUD Code to confirm compliance with all applicable requirements.

The constantly shifting regulatory framework being asserted by the City makes it virtually impossible to operate in compliance. At various times, we have been told our community is subject to the Michigan Building Code, the Michigan Residential Code, the Michigan Rehabilitation Code, ANSI standards, HUD standards, and even that we may "choose our own code." Many of these codes contradict one another or apply to entirely different classes of structures, resulting in an arbitraw and inconsistent enforcement posture.

This lack of clarity not only undermines the City's credibility but also deprives operators of a clear and uniform standard by which to plan improvements and maintain compliance. A manufactured housing

community cannot function under a moving target where regulatory obligations change depending on which department or inspector happens to be involved.

Please provide the ordinance citation.

Sincerely,

Brenton Chandler  
Chandler Capital LLC  
510 Bering Dr. Ste. 620  
Houston, TX 77057

Asher, Kyle

From: Brenton Chandler  
<bcc@chandcap.com>  
Sent: Thursday, September 18, 2025 1  
1:33 AM  
To: Kirk Rehn  
cc: Mary Michaels; Hanselman, Jason  
Subject: Re: Twin Pines - Regulatory  
Requirements

CAUTION: External Sender

Report Suspicious

Verify sender before opening links or files

Following up on my email below.

Thank you,

Brenton Chandler  
Chandler Capital LLC  
510 Bering Dr. Ste. 620  
Houston, TX  
77057 P: (281)  
777-9992  
[www.chandcap.com](http://www.chandcap.com)

On Sep 9, 2025, at 7:56 AM, Brenton Chandler <bcc@chandcap.com> wrote:

We received your response to our permit application at 2415 Jarvis. I have a few questions that I would like clarified:

Michigan Residential Code: As outlined in my original email below, the Michigan Residential Code explicitly states it applies only to mobile homes placed on privately owned lots. Please identify the specific legal authority that allows the City to extend MRC provisions to homes in a licensed manufactured housing community.

Prior Approval on Same Lot: I've attached an email from you, Kirk Rehn, approving a home on the same lot and same park in 2023. Given that you personally approved this same lot in 2023 under identical circumstances, can you explain why, in 2025, the City has imposed new requirements so burdensome that they amount to a constructive denial of the application? Please also provide evidence that any new or more stringent requirements were filed with and approved by the Michigan Manufactured Housing Commission, as required by MCL 125.2307. I've attached the permit application and approval from 2023, the permit application from 2025, and an email from you from 2023.

- Water & Sewer Issues: Your response references "water and sanitary sewer issues." Between myself and prior ownership, more than \$500,000 has been invested into water and sewer system upgrades at Landmark Estates. We are not aware of any outstanding issues. Please specify what problems you believe exist.
- Consistency of Enforcement: Other manufactured housing communities in Warren have reportedly received permits without being required to submit site plans. Please explain why Landmark Estates and Twin Pines are being subjected to different standards. If different standard are being applied, please identify the legal authority for doing so. Additionally, MCL 125.2307 requires that any higher or more stringent local standard be filed with and approved by the Michigan Manufactured Housing Commission before it can be enforced. Please provide evidence that the City's asserted 'site plan' requirement for placement of replacement homes in

existing communities was ever filed with, reviewed by, and approved by the Commission.

Our application was submitted on July 9, 2025, yet no response was provided until September 3, 2025 nearly eight weeks later. An eight-week delay in even acknowledging a permit application is unreasonable, unacceptable, and constitutes obstruction of lawful housing activity. At a minimum, the City has an obligation to process applications in a timely manner, or to promptly notify applicants of any deficiencies.

The City's approach has imposed a significant human cost and prevented us from expanding the supply of affordable housing. Warren faces a desperate need for affordable housing, and every month of delay and obstruction prevents numerous families from moving into safe, high-quality homes. This obstruction directly harms the most vulnerable and at-risk residents of Warren. Restricting the supply of affordable housing serves neither the City nor its residents—it is a stance without logic, without compassion, and without benefit.

Sincerely,

Brenton Chandler  
Chandler Capital LLC  
510 Bering Dr. Ste. 620  
Houston, TX  
77057 P: (281)  
777-9992  
[www.chandca.com](http://www.chandca.com)

<City of Warren Permit Application Repsonse.pdf>  
<4-28-2023 Permit Approval Email.pdf>  
<Completed Building Permit Application (1) (l).pdf>  
<2025 Application.pdf>  
<2023 Application.pdf>  
<MCL-125-2307 2.pdf>  
<Approved Building Permit - 1924 Jarvis.jpg>

Begin forwarded message:

From: Brenton Chandler <bcc@chandcap.com>

Subject: Twin Pines - Regulatory Requirements

Date: August 28, 2025 at PM CDT

To: Kirk Rehn <krehn@cityofwarren.org>

Cc: Mary Michaels <mmichaels@cityofwarren.org>, "Hanselman, Jason" <JHanselman@dykema.com>

Following up on our phone call this afternoon, I am once again requesting the specific city, state, or federal ordinance that requires a pre-inspection for cosmetic repairs such as painting and flooring, as you indicated would be required of homes at our community moving forward.

You cited the Michigan Residential Code, Appendix E. However, the very first sentence of Appendix E itself states that it applies only to "a manufactured home used as a single dwelling unit installed on privately owned (non-rental) lots." Here's a link if you'd like to verify: <https://up.codes/viewer/michigan/mi-residential-code-2015/chapter/E/manufactured-housing-used-as-dwellings#AE101>

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The constantly shifting regulatory framework being asserted by the City makes it virtually impossible to operate in compliance. At various times, we have been told our community is subject to the Michigan Building Code, the Michigan Residential Code, the Michigan Rehabilitation Code, ANSI standards, HUD standards, and even that we may "choose our own code." Many of these codes contradict one another or apply to entirely different classes of structures, resulting in an arbitrary and inconsistent enforcement posture.

This lack of clarity not only undermines the City's credibility but also deprives operators of a clear and uniform standard by which to plan improvements and maintain compliance.

A manufactured housing community cannot function under a moving target where regulatory obligations change depending on which department or inspector happens to be involved.

Please provide the ordinance citation.

Sincerely,

Brenton Chandler

Chandler Capital LLC

510 Bering Dr. Ste. 620

Houston, -rx 77057

# Exhibit D

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF MACOMB

MICHIGAN MANUFACTURED  
HOUSING ASSOCIATION,

Case No. 25- \_\_\_\_\_ -cz

Plaintiff,

Hon.

CITY OF WARREN,

Defendant.

---

AFFIDAVIT OF JASON JANDA

STATE OF CALIFORNIA ) COUNTY OF ORANGE )

I, Jason Janda, being first duly sworn, states:

1) I have personal knowledge of the facts in this Affidavit or base such knowledge on the business records retained by Rochester Property Group, Motor City MHP LLC, and Motor City Mobile Home Park ("Motor City") in the ordinary course of business. I am competent to so testify.

2) I am the CEO of Rochester Property Group ("Rochester") and, through Rochester, the manager of Motor City MHP LLC Rochester has an ownership interest in Motor City MHP, LLC Motor City MHP LLC, in turn, has an ownership interest in Motor City,

3) Motor City is a manufactured housing community located in the City of Warren.

4) I have been involved in Motor City's operations since September 2020. Since that we have invested significant resources into maintaining and improving the community

to ensure safe and affordable housing for its residents, These improvements include electrical work, water and plumbing improvements, drainage work, common area improvements, and cosmetic improvements such as painting.

5) When we initially obtained an ownership interest in Motor City, things ran smooth, We had a productive working relationship with the prior City Inspector, and completed the above improvements, along with other items such as the installation of a back flow preventer.

6) In 2022, however, City Inspector John Impellizzeri became involved and the ability to continue operating and improving Motor City became significantly more difficult, Since then, the City has prevented new or existing residents from occupying existing homes within the Community, and unlawfully ordered Motor City to reduce the number of available homes within the Community.

7) At the outset, in October 2022, Mr. Impellizzeri indicated that virtually every vacant home in Motor City must be tom down, despite not entering or inspecting the homes to assess their condition. Some of these homes were owner-occupied, leading those residents to fear that they would lose their homes. Mr. Impellizzeri did not conduct any formal inspection or follow any required procedures when doing so. Instead, he simply wrote down a list of numerous homes as "vacant, dilapidated, & unsafe trailers infested & unsecured." A copy of this notice is attached as Exhibit 1 to this Affidavit.

8) In an effort to cooperate, Motor City agreed to demolish seven of the homes, and Mr. Impellizzeri stated he would mark Motor City as being in compliance with the City's requirements.

9) Within two years of that, however, Mr. Impellizzeri stated that an additional nine homes must be demolished. He issued red tags on those homes, again without entering the homes to inspect them or conducting any structural testing, even though the homes are legally

compliant. Pictures of the interiors of homes Mr. Impellizzeri has red tagged without entering are attached as Exhibit 2 to this Affidavit

10) In one instance, Mr. Impellizzeri issued a red tag on an owner-occupied home, causing the resident to have concerns that their home would be demolished.

11) When issuing these red tags, Mr. Impellizzeri failed to comply with the City's ordinances, which require the City to identify the issue rendering the structure unsafe, provide for the ability to cure the asserted issue, and provide for a hearing to contest the asserted issue. Effectively, Motor City has been left without any ability to challenge the City's unsafe structure or demolition notices. It is my understanding that in April 2025, other inspectors from the City (Bob and Joe) walked by homes that Mr. Impellizzeri had red tagged and did not understand why the red tags had issued.

12) In addition, Mr. Impellizzeri has informed staff at Motor City that as soon as a home becomes vacant, it is removed from the available housing stock within Motor City; that homes must be built and renovated in accordance with the Michigan Residential Code; and he has labeled the homes at Motor City "campers" that cannot be renovated even though the title to the homes correctly recognizes them as manufactured houses.

13) The City's action have prevented Motor City from constructing new homes, renovating existing homes, and from moving new residents into Motor City.

14) There is a demand from the City's residents to move into Motor City, but the City's actions have prevented that from happening.

15) Even when Motor City has attempted to comply with the City's shifting (and improper) requirements, no progress has been made. For example, Motor City obtained a

professional zoning conformance report in September 2022, which found that the "existing use" of the community was "in conformance." See Zoning Report, Ex, 3. This report explained that, while some aspects of the property (such as setbacks) were not compliant with the current zoning standards, "the subject property was constructed in 1950, which predates the current Zoning regulations, adopted June 9, 1987" and would be considered pre-existing legal nonconforming."

16) The Zoning Report also includes a letter from the City's Zoning Inspector, Deborah Wenson, which states that a "site plan was never required for this property" and that "[t]here are certain areas of pre-emption on the part of the State of Michigan concerning the construction and operation of mobile home parks. One of the areas of pre-emption is the requirement of site plan approval by the local government."

17) Ms, Wenson's Letter further notes that the "property has been in existence prior to the enforcement of the current Zoning Ordinance" and that "[a]ny mobile home that has a permit and received final inspection approval is legal non-conforming."

18) Yet today, the City is still refusing to allow renovation of existing homes within the community.

19) Motor City has more than 15 homes that it is seeking to renovate, but the City has issued red tags on 10 of these homes without following the required procedures. Motor City is hesitant to continue investing and completing work to improve the non-red tagged homes because, based on past experience, it is likely that the City will immediately red tag those homes, as well.

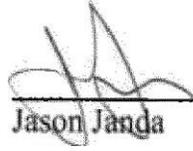
20) The City's actions of ordering homes to be demolished, and red tagging the remaining homes, has created significant financial loss to Motor City. The inability to construct new homes or move residents into existing homes has directly impacted occupancy levels. And the decrease in occupancy levels has directly impacted Motor City's ability to obtain loan financing,

which will allow for further improvements to the community. This not only impacts Motor City, but it is also reduced the availability of affordable housing for residents of the City of Warren who wish to move into Motor City.

21) I take great pride in the communities that we operate. I oversee manufactured housing communities in 8 different states, and the City of Warren is the only location where I have run into any similar issues.

Further affiant sayeth note

[Signature page follows]



Jason Janda

CEO, Rochester Property Group

Subscribed and sworn to by \_\_\_\_\_ before me on the \_\_\_\_\_ day of

\_\_\_\_\_, \_\_\_\_\_, 20\_\_\_\_

Signature

\_\_\_\_\_

Printed name \_\_\_\_\_

Notary public, State of \_\_\_\_\_

County of \_\_\_\_\_

My commission expires \_\_\_\_\_

\_\_\_\_\_

*See Attachment*

CALIFORNIA JURAT WITH AFFIANT STATEMENT GOVERNMENT CODE S 8202

See Attached Document (Notary to cross out lines 1-6 below)

See Statement Below (Lines 1-6 to be completed only by document not Notary)

Signature of Document Signer 1

Signature of Document Signer No. 2 (if any)

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of

Subscribed and sworn to (or affirmed) before me

California

County of

on this 5 day of

2015...

Date

Month

Year

by

(and (2)

Name(s) of Signer(s)

CINDY  
\*SASEL DE  
LEON  
Public •  
California

Commission  
My Comm. Expires

It

Orange County  
proved to me on the  
basis of satisfactory  
evidence to be the

person(s) who appeared before me.

Signature

signature of No Public

Seal

Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document Description of Attached Document

Title or Type of Document:

Document Date:

Number of Pages: Signer(s) Other Than Named Above:

02014 National Notary Association • [www.NationalNotary.org](http://www.NationalNotary.org) • 1 -BOO-US NOTARY (1-800-876-6827)  
Item #5910

# Exhibit I

CITY OF WARREN BUILDING  
DEPARTMENT  
INSPECTION

CERTIFICATE Phone:  
(586) 5744504

Permit No:

Date:

Address:

Contractor or Owner:

Violations:

Inspector:

# Exhibit 2

C 27











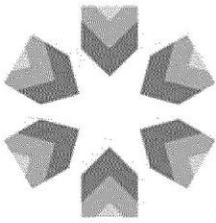


# 調 査 物

調査 No. 40

.....

# Exhibit 3



Nova  
Group

Inspired Solutions  
by Nova Group

# Zoning Conformance Report

## Property

---

Motor City MHC  
23765 Lawrence Ave.  
Warren, MI 48091

## Prepared For

---

BSPRT CMBS Finance, LLC, BSPRT CRE Finance, LLC, and BSP  
OF Finance, LLC, their affiliates, employees, agents,  
successors and assigns  
1345 Avenue of Americas Suite 32A  
New York, NY 10105

## Prepared By

---

Nova Group, GBC  
788 Sterling Drive  
Choctaw, OK 73020  
TEL: (405) 496-3105  
Web: [novagroupgbc.com](http://novagroupgbc.com)

Alicia Taylor  
Vice President, Zoning Group

Nova Project No: R22-8344  
Report Date: 9/14/2022



[novagroupgbc.com/carbonneutral](http://novagroupgbc.com/carbonneutral)

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APPENDIX B: Date Page	

APPENDIX C: Bulk Zoning Requirements

APPENDIX D: Parking Requirements

APPENDIX E: Nonconforming Section

APPENDIX E: Definitions

Property Name:	Motor City MHC
Property Address:	23765 Lawrence Ave., Warren, Michigan 48091
Jurisdiction:	City of Warren, Michigan
Property Size:	5.974 Acres or 260,218 Square Feet, per Survey
Building Size:	1,014 Square Feet, per Survey (Maintenance Buildings)
Year Constructed:	1950
Property Use(s):	Mobile Home Park (126 Units)

Publicly available Property Photograph(s)

## 2.0 ZONING AND USE INFORMATION

### Street View

Name and Date of Zoning Ordinance:	City of Warren, Michigan municipal code, codified through July 25, 2022
Applicable Zoning Regulations obtained online at the following website:	<a href="https://library.municode.com/mi/warren/codes/code_of_ordinances?nodeId=PTIIC00R_APXAZO#TOPTITLE">https://library.municode.com/mi/warren/codes/code_of_ordinances?nodeId=PTIIC00R_APXAZO#TOPTITLE</a>
Existing Zoning Classification:	R4 - Mobile Home District
Adjacent Zoning Classifications and or Uses if Applicable:	Not Applicable
Existing Property Use(s):	Mobile Home Park (126 Units)
Is existing use(s) permitted?	Yes
Was Special permitting, condition(s), variances or ordinances applied to the existing use?	No

### Is the Existing Use in Conformance?

Yes, as permitted use(s), per review of section 11.01 of the current Zoning Ordinance.

Front: Right-of-Way or Main Highway:  
25 Feet (Landscaped)

Side / Rear: 10 Feet

Buffer Yard: 8 Feet along all interior lot lines.

Space Between Mobile Homes: Side by Side: 15 Feet  
End to End: 10 Feet

**Building Set-Back Lines:**

Required:

Existing:

Sherwood Avenue: 25 Feet+/-  
(Landscaped). per scale of Survey.

Lawrence Avenue: 16 Feet+/-  
(Landscaped), per scale of Survey.

North Side: 0 Feet, per Survey  
South Side: 0 Feet, per Survey

North Side: 0 Feet, per Survey  
South Side: 0 Feet per Survey

Side by Side: 8 Feet+/-, per scale of Survey

End to End: 2 Feet+/-, per scale of Survey

Zoning Conformance Report

**Is the Existing Building in Conformance with the above noted requirements?**

Maximum Building Coverage	Not Restricted in the R-4 District	Not Applicable	No, per review
Building Height:	Required:	Existing:	
Maximum Building Height:	1 Story / 15 Feet	1 Story. Estimated not to exceed 15 Feet in height based on typical one story structures of similar use.	

Yes, per review of Section 11.02 of the current Zoning Ordinance.

Building Area Requirements:	Required:	Existing:
Minimum Lot Area	Individual Mobile Home Lots: 2,500 Square Feet	2,065 Square Feet (Lot Area: 260,218 Square Feet / 126 Pad Sites)
Minimum Recreational Space	100 Square Feet per mobile home, with a minimum of 5,000 Square Feet 126 Pad Sites X 100 12,600 Square Feet Recreational Space Required	0 Square Feet, per Survey

of Section 11.03 of the current Zoning Ordinance. See Section 5 for additional information.

No, per review of Section 11.03 of the current Zoning Ordinance. See Section 5 for additional information.

Yes, per review of Section 11.03 of the current Zoning Ordinance.

# PARKING STANDARDS

Parking Requirements:	Required Parking Spaces:	Existing Parking Spaces:
R-4 District: 1 Space per mobile home	126 Homes = 126 Total Parking Spaces	85 Spaces, per Survey Per review of the Survey and aerial imagery, mobile home lots do not provide sufficient asphalt area at each lot to accommodate at least 1 parking space per lot.

## Is the Existing Parking in Conformance?

No, per review of Section 4.32 of the current Zoning Ordinance. See Section 5 for additional information.

Property Status: No  
 Is the Property Conforming to Use?  
 Is the Property Conforming to  
 Development Standards?

Legal Nonconforming see Section 5.1  
 Mobile Homes encroach into front yard  
 setback along Lawrence Avenue by 9 Feet.  
 Site is deficient minimum landscaped  
 buffer along right-of-way (Lawrence  
 Avenue) by 9 Feet. Mobile Homes  
 encroach into side yard setback along  
 north property line by 10 Feet. Mobile  
 Homes encroach into side yard setback  
 along south property line by 10 Feet. Site is  
 deficient minimum landscaped buffer  
 along interior yard (North property line) by  
 8 Feet. Site is deficient minimum  
 landscaped buffer along interior yard  
 (South property line) by 8 Feet. Mobile  
 Homes encroach building separation (side

## CONFORMANCE STATUS

Is the Property Conforming to  
 Parking?  
 Response: Conforming Status:  
 Nonconforming Characteristics:

Yes            Legal Conforming  
                       None  
 No

Legal Nonconforming see Section 5.1 Site is deficient 41 total parking spaces.

by side) by 7 Feet. Mobile Homes encroach  
 building separation (end to end) by 8 Feet.  
 Individual Mobile Home Lots are deficient  
 lot area by 435 Square Feet. Site is  
 deficient minimum recreational area by  
 12600 Square Feet.

### Conformance Conclusion

Legal Conforming to Use, Height and Density.

Legal Nonconforming to Setbacks, Building Site Area and Parking.

Please note, the subject property was constructed in 1950, which predates the current Zoning regulations, adopted June 9, 1987 and would be considered pre-existing legal nonconforming.

### Right to Rebuild (in the event of any Nonconformity)

Section 4.17:

Zoning Conformance Report

## CONTACT INFORMATION

Nothing in this Ordinance shall prevent the restoration, repairing, or rebuilding of any non-conforming building or structure damaged to the extent of sixty (60) percent or less of its valuation by fire, explosion, act of God, or any act of the public enemy, subsequent to the effective date of this Ordinance, or shall prevent the continuance of the use of such building or part thereof. as such use existed at the time of such impairment of such building or part thereof.

This report was prepared by Casey Sherwood. Questions may be directed to Alicia Taylor at (405) 496-3105 or by email to [alicia.taylor@novagroupgbc.com](mailto:alicia.taylor@novagroupgbc.com). Please reference Project Number R22-8344.

Nova Group GBC obtained this information within this report from governmental sources and independent land Surveyors. While we believe this information is accurate, we cannot guarantee its accuracy.

Nova Group GBC has relied on information provided by the following contacts:

Jurisdiction:	Surveyor:
City of Warren, Michigan	Kem-Tec Surveying
Zoning Department	22556 Gratiot Avenue
One City Square	Eastpoint, Michigan 48021
Warren, Michigan 48093	800-295-7222
586-574-4668	Date: September 21, 2020

Information Requested:

Is a Zoning Verification Letter available? No

Are there any open zoning code violations? No

Are there any open building code violations?

Are there any open Fire code violations? No

Is a Certificate of Occupancy available? No

Are copies of the Site Plan Approval or Planned Development available, if applicable?

Are there any active or proposed condemnation proceedings at this property?

Response: Information Received:

Yes See attached Zoning Letter dated August 30, 2022

No Per Mandy Wells, Building Division, there are no violations on file for the subject Property.

Yes Per Mandy Wells, Building Division there is an open violation on file for the subject Property. See attached Inspection Report. Please contact Mandy Wei's, Building Division (586-574-4504),

for any additional information.

Per Sharon Dacoff, FOIA Department, there are no violations on file for the subject Property.

Copies of Certificates of Occupancy were unable to be located for the subject property. The lack of a Certificate of Occupancy in municipal files is not considered a violation and will not give rise to any enforcement action affecting the project.

Copies of the Approved Plan were unable to be located.

Per Mary Michaels, Chief Assistant City Attorney, there are no active of proposed condemnation proceedings at this property.

## RELIANCE

This Zoning Conformance Report was prepared based on review of the current zoning requirements in comparison with the Alta Survey. The purpose of the zoning report is to provide your staff with a thorough zoning analysis of the site's zoning compliance, including review of use, parking, and development standards.

Nova Group, GBC certifies that we have no undisclosed interest in the Property, and that our employment and compensation are not contingent upon our findings or opinions. The scope of this research and reliance language are outlined within this Report.

This report is for the exclusive use of BSPRT CMBS Finance, LLC, BSPRT CRE Finance, LLC, and BSP OF Finance, LLC, their affiliates, employees, agents, successors and assigns as listed on report cover page and any and all holders of a note or notes secured by a mortgage, deed of trust or deed to secure debt encumbering the Property, and their respective affiliates, designates, successor and or assigns and no other party shall have any right to rely on any service provided by Nova Group, GBC without prior written consent.

Each of BSPRT CMBS Finance, LLC, BSPRT CRE Finance, LLC, and BSP OF Finance, LLC, their affiliates, employees, agents, successors and assigns may rely on this report in evaluating a request for an extension of credit (the "Mortgage Loan") to be secured by property. This information may also be used by any actual or prospective purchaser, transferee, assignee, or servicer of the Mortgage Loan, any co-lender, mezzanine lender or participant in the Mortgage Loan, any actual or prospective purchaser, (including agent or advisor) in any securities evidencing a beneficial interest in or backed by the Mortgage Loan, any rating agency actually or prospectively rating any such securities, any trustee or indenture trustee, and any institutional provider(s) from time to time of any liquidity facility or credit support for such financing. In addition, this report, or a reference to this report, may be included or quoted in any offering circular, registration statement, or prospectus in connection with a securitization or transaction involving the Mortgage Loan and/or such securities and consultant has agreed to cooperate in answering questions by any of the above parties in connection therewith. This report has no other purpose and should not be relied upon by any other person or entity.



# APPENDIX A: Jurisdiction Responses



August 30, 2022

**BUILDING DIVISION**  
ONE CITY SQUARE, SUITE 3  
WARREN, MI 48093-23  
(586) 574-45  
FAX (586) 574-45  
[www.cityofwarren.com](http://www.cityofwarren.com)

Nova Group  
121198 S 4159 Road  
Eufaula, OK 74432

Re: 23765 Lawrence, Parcel #12-13-28-401-004 & 006.

Attn: Jessica Morgan

The property described above is located in an R-4 zoning district. The R-4 district is classified as a Mobile Home district, this district allows for the use of this property as Mobile home courts and trailer coach parks. The property has been in existence prior to the enactment of the current Zoning Ordinance and therefore does not comply with several areas of the code.

A site plan was never required for this property. There are certain areas of pre-emption on the part of the State of Michigan concerning the construction and operation of mobile home parks. One of the areas of pre-emption is the requirement of site plan approval by the local government. The property is not in compliance with applicable ordinances and requirements of the Building Division A copy of the ordinance is attached for your convenience,

Any mobile home that has a permit and received final inspection approval is legal non-conforming. Any work or new mobile homes will require permits. No variances have been granted for this address, There is a code enforcement complaint regarding the condition of as several dilapidated units. In addition there is an open Plumbing permit (P22-000606 issued 7/27/2022). Should you have further questions Please contact the Building Division.

Respectfully,

Deborah Wenson

Zoning Inspector

ARTICLE - R-4 MOBILE HOME DISTRICTS

Footnotes:

Cross reference— Mobile homes generally, Ch. 20.

Section 11.01 - Uses permitted.

In all R-4 Districts no building or land, except as otherwise provided in this Ordinance, shall be erected or used except for one (1) or more of the following specified uses, on approval of the Planning

Commission with respect to site layout and pedestrian and vehicular circulation:

- (a) Mobile home courts and trailer coach parks.

Section 11.02 - Building height.

No building or structure hereafter erected or altered in an R-4 District shall exceed one (1) story in height or fifteen (15) feet, except as provided in Article XIX of this Zoning Ordinance,

Section 11.03 - Space requirements.

- (a) The minimum unit area of premises used or occupied by each trailer shall be two thousand five hundred (2,500) square feet, clearly defined on the ground by stakes, posts, or other markers, except that where a separate parking area is provided on the trailer camp lot for motor vehicles and no motor vehicles are parked on the trailer unit area, that the minimum unit area of the premises used or occupied by each trailer shall be two thousand (27000) square feet, and in such event there shall be provided one (1 ) parking stall for each trailer unit.
- (b) There shall be unobstructed open spaces between each trailer coach or mobile home of not less than fifteen (15) feet and not less than ten (10) feet of

unobstructed open space between the ends of adjacent trailer coaches. Hitches shall not extend beyond the boundary lines of the sites, except where such parking space is provided in street in accordance with Schedule of Road Widths in Article XI.

- (c) No trailer shall be located closer than twenty-five (25) feet from the right-of-way line of a main highway, or ten (10) feet from the mobile court or trailer camp property line.
- (d) One passenger motor vehicle may be parked on the private street in front of the trailer coach site, provided it complies with the Schedule of Road Widths, in Article X', of this Ordinance, and provided further additional off-street parking space of one-half (h) parking stall per trailer unit is provided within the trailer coach park for additional private passenger vehicles which

11

belong to the occupants of the trailers and for visitors' cars.

- (e) Each trailer space or site shall be provided with a concrete apron or concrete ribbons, not less than twenty-four (24) inches wide, upon which the trailer shall be located.

#### Section 11.04 - Roads and sidewalks.

Each individual trailer coach site shall abut or face a driveway, roadway, or street of at least thirty (30) feet in width which street shall have unobstructed access to a public street or highway. Existing licensed trailer parks shall not be required to increase the width of the streets within said parks to thirty (30) feet as long as said parks are not redesigned or altered. All such roadways shall be hard surfaced.

Each trailer coach park shall provide a thirty (30) inch concrete walk from the entrance of each trailer to all required service facilities.

Roadways and streets within all existing trailer coach parks shall conform to the following schedule regarding vehicle traffic use, including motor vehicle parking.

Motor Vehicle Parking Allowance	Traffic Use	Min. Rd. Width
1 . No parking on road (Separate lot or on-site parking provided)	2-way road	20 feet
2. Parallel parking, 1 side only	1 -way road	20 feet
3, Parallel parking, 2 sides	1 -way road	26 feet
4. Parallel parking, 2 sides	2-way road	36 feet

Where sidewalks are provided, the space required shall be in addition to the above schedule,

Section 11.05 - Plumbing and electrical installations.

Plumbing and electrical installations in R-4 Districts shall be maintained in accordance with the City of Warren Plumbing and Electrical Codes.

#### Section 11.06 - Additional requirements.

In addition, all trailer coach parks shall comply with the following:

- (a) There shall be provided an area of not less than one hundred (100) square feet for recreation, for each trailer space in the Mobile Home Park, with a minimum area of not less than five thousand (5,000) square feet, which shall be no longer than two (2) times its width. Such area shall be developed and maintained by the management so as to provide healthful recreation for the children of the Mobile Home Park.
- (b) A greenbelt planting strip, not less than eight (8) feet in width, shall be located along all lot lines not bordering a street. Such greenbelt shall be composed of one (1) row of deciduous and/or evergreen trees, spaced not more than four (4) feet apart and not less than one (1) row of shrubs spaced not more than eight (8) feet apart and which grow at least to a height of five (5) feet or more after one (1) full growing season and which shrubs will eventually grow to a height of not less than twelve (12) feet. A fence may be built on the trailer coach park property lines, in lieu of a greenbelt as heretofore required, said fence shall be not less than four (4) feet nor more than six (6) feet in height, constructed of woven wire or open metal or wood pickets and no barbed wire shall be used in the construction of said fence.
- (c) The front yard and the side yard adjacent to a street shall be landscaped and the entire Mobile Home Park shall be maintained in a good, clean presentable condition at all times.
- (d) No business of any kind shall be conducted in any mobile home,

trailer or building or on the premises of the Mobile Home Park, except that of the management office.

- (e) Street and yard lights, sufficient in number and intensity to permit the safe movement of vehicles and pedestrians at night, shall be provided and shall be effectively related to buildings, trees, walks, steps, and ramps.
- (f) All fuel oil and all gas tanks shall be located on each trailer site in a uniform manner. All tanks shall be of an approved type to comply with building code standards and shall be equipped with vent pipes and with fused valves. All tanks shall be elevated on noncombustible stands and placed on a concrete base.
- (g) There shall be no storage underneath any trailer and each trailer site shall be maintained in a clean and presentable condition at all times.
- (h) Fences other than those surrounding the park shall be uniform in height and shall not

exceed thirty (30) inches in height and shall be constructed in such a manner as to provide firemen access to all sides of each trailer.

- (i) Fire hydrants of a size and pressure to be used by the City of Warren Fire Department shall be placed within said trailer park so that no trailer shall be more than six hundred (600) feet from a fire hydrant.
- (j) A one family dwelling may be permitted on the site provided that such dwelling is limited to the management's residence and provided further, such dwelling complies with the requirements of the R-I-D Districts of the Ordinance. A portion of such dwelling may be utilized for management's office.

(k) Reserved.

(Ord. No. 30-945, 5 4, 4-27-04)

Cross reference— License fee schedule, S 1 8-1 8.



JAMES R. FOUTS - MAYOR

CITY ATTORNEYS OFFICE

ONE CITY SQUARE, SUITE 400

WARREN, MI 48093-

5285 (586)

574-4671

FAX (586) 574-

4530 www cit

ofwarrenzor

August 19, 2022

Ms. Jessica Morgan

12198 S. 4159 Road

Eufaula, Oklahoma 74432

SENT VIA EMAIL TO:

[zoning@novagroupgbc.com](mailto:zoning@novagroupgbc.com)

Re: Freedom of Information Act Request

Dear Ms. Morgan:

On August 16, 2022, this office received the Freedom of Information Act (FOIA) request you submitted for the following records:

- Please provide copies of the below documents or indicate note on file for the Motor City MHC located at 23766 Lawrence Avenue—126 Units.
- Information/copies of any open zoning code violations currently on file
- Information/copies of any open building code violations currently on file
- Information/copies of any open fire code violations currently on file
- Copies of Certificates of Occupancy
- Copies of any variance, special and or conditional use permits that have been granted
- Copies of the final approved site plan

- Are there any current or future road construction projects such as road widening, resurfacing, easement, condemnation, sewer or " sidewalk repair that would affect access to the subject property or result in the taking of right-of-way.

Please be advised that your request for Building Department records is granted to the extent records exist, are public records, can be identified, and are not exempt from disclosure. Any information not subject to disclosure shall be redacted from the public document, pursuant to MCL 15.243(1)(d), such as personal phone numbers and home addresses, Please note that site plans may only be viewed, not copied, due to copyright laws. Please contact the custodian of the records below in order to make arrangements for obtaining your requested information.

The custodian of these records is:

Ms. Mandy Wells or Ms. Karen Campbell  
City of Warren Building Department  
One City Square, Suite 305  
Warren, Michigan 48093-2391  
(586) 5744504

Ms. Jessica Morgan

August 19, 2022

Page 2

Please be advised that per our Engineering Department, there are no "future road constructions projects" planned.

Please be advised that your request for Fire Department records is denied pursuant to MCL Sec., 15.235(5)(b) in that the public record does not exist under the name given by the requestor or by another name reasonably known to the public body,

As a result of this response, you may do either of the following:

- Appeal the denial to the head of the public body pursuant to Section 10 of the Act. Appeals must be in writing, must specifically state the word "appeal," and must identify the reason or reasons for reversal of the denial. Written appeals shall be submitted to the FOIA Appeals Committee c/o City Council Office, 5460 Arden, Warren, MI 48092.
  
- Seek judicial review of the denial under Section 10 of the Act

You may be entitled to receive attorneys' fees and damages as provided in Section 10 if, after judicial review, the circuit court determines that the public body has not complied with Section 5 of the Act and orders disclosure of all or a portion of a public record.

The City of Warren's FOIA Procedures and Guidelines along with a Written Public Summary can be found online at [www.cityofwarren.org](http://www.cityofwarren.org).

Sincerely,



Marygchaels

Chief Assistant City Attorney

EVIs/Morgan-grant in part fire & building 1088958

cc: Mandy Wells, Building Dept.

Karen Campbell, Building Department

Ms. Jessica Morgan  
August 19, 2022  
Page 2

Please be advised that per our **Engineering Department**, there are no "future road constructions projects" planned.

Please be advised that your request for **Fire Department** records is denied pursuant to MCL Sec. 15.235(5)(b) in that the public record does not exist under the name given by the requestor or by another name reasonably known to the public body.

As a result of this response, you may do either of the following:

- Appeal the denial to the head of the public body pursuant to Section 10 of the Act. Appeals must be in writing, must specifically state the word "appeal," and must identify the reason or reasons for reversal of the denial. Written appeals shall be submitted to the FOIA Appeals Committee c/o City Council Office, 5460 Arden, Warren, MI 48092.

- Seek judicial review of the denial under Section 10 of the Act

You may be entitled to receive attorneys' fees and damages as provided in Section 10 if, after judicial review, the circuit court determines that the public body has not complied with Section 5 of the Act and orders disclosure of all or a portion of a public record.

The City of Warren's FOIA Procedures and Guidelines along with a Written Public Summary can be found online at [www.cityofwarren.org](http://www.cityofwarren.org).

Sincerely,

  
Mary Michaels  
Chief Assistant City Attorney

EVIs/Morgan-grant in part fire & building ID88958

cc: Mandy Wells, Building Dept.  
Karen Campbell, Building Department

Evelyn Davis

From: Mandy Wells <[mwells@cityofwarren.org](mailto:mwells@cityofwarren.org)>

Sent: Wednesday, September 7, 2022 7:46 AM  
Evelyn Davis  
Subject: Re: co response for Motor City MHC R22-8344

The building division does not require MHCs to have a certificate of occupancy. It is not a violation.

Thank you,

Mandy Wells  
City of Warren  
Building Division  
586-574-4504



---

From: Evelyn Davis <evelyn.davis@novagroupgbc.com>  
Sent: Wednesday, August 31, 2022 1:14 PM  
To: Mandy Wells <mwells@cityofwarren.org>; Karen Campbell <kcampbell@cityofwarren.org>  
Subject: r-w: 8/31 follow up on FOIA REQ for Motor City MHC R22-8344

Evelyn Davis

Zoning Document Specialist | Nova Group, GBC  
↓ (405) 509-3546 | ✉ [evelyn.davis@novagroupgbc.com](mailto:evelyn.davis@novagroupgbc.com)

---

From: Zoning Group <zoning@novagroupgbc.com>  
Sent: Friday, August 19, 2022 10:33 AM

To: Evelyn Davis  
<evelyn.davis@novagroupgbc.com> Subject: FW:  
8/19 FOIA REQ response on sp fcv

Good Afternoon

Following up on the request, I am still in need of a copy of a certificate of occupancy, if one not on file can you tell me if that would be considered a violation? Thanks for your help

Jayne Galloway

Zoning Document Specialist | Nova Group, GBC  
☎ (405) 429-8526 | ✉ [jayne.galloway@novagroupgbc.com](mailto:jayne.galloway@novagroupgbc.com)

---

From: Sharon Dacoff <sdacoff cit ofwarren,,or >

Sent: Friday, August 19, 2022 10:28 AM

To: zoning Group

Cc: Mandy Wells <mwells cit ofwarren«or >; Karen Campbell <kcam bell cit ofwarren«or >

Subject: FOIA REQUEST

1

Ms. Morgan:

Attached please find our response to your recently submitted FOIA requests.

SHARON DACOFF  
PARALEGAL ADMINISTRATIVE CLERK  
CITY ATTORNEYS OFFICE  
ONE CITY SQUARE, SUITE 400  
WARREN, MI 48093  
(586) 574-4674 (phone)  
(586) 574-4530 (fax)  
EMAIL: SDACOFF (ICITYOFWARREN.ORG)

The material contained in this message and the attached documents contain information which is privileged, confidential and exempt from disclosure under the law. These materials are not to be duplicated, reproduced, distributed or disseminated in any fashion and/or by any means whatsoever. If you are not the intended recipient, employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any viewing, examination distribution or copying in any

fashion or manner of this information is strictly prohibited. If you have received this communication in error, please notify Warren City Attorney's Office by telephone at (586) 574-4671.

# **APPENDIX B: Date Page**

# Code of Ordinances

Supplement 90

Online content updated on July 25, 2022

CODE OF ORDINANCES City of WARREN, MICHIGAN Codified through Ordinance No. 80-800, adopted May 12, 2022. (Supp. No. 90)

[VIEW WHAT'S CHANGED](#)

[BROWSE TABLE OF CONTENTS](#)

This Code of Ordinances and/or any other documents that appear on this site may not reflect the most current legislation adopted by the Municipality.



# **APPENDIX C: Bulk Zoning Requirements**



8/22/22, 2:15 PM

## ARTICLE XI. - R-4 MOBILE HOME DISTRICTS

### Footnotes:

Cross reference— Mobile homes generally, Ch. 20.

### Section 1 1 .01 - Uses permitted.

In all R-4 Districts no building or land, except as otherwise provided in this Ordinance, shall be erected or used except for one (1) or more of the following specified uses, on approval of the Planning Commission with respect to site layout and pedestrian and vehicular circulation:

- (a) Mobile home courts and trailer coach parks.

### Section 1 1.02 - Building height.

No building or structure hereafter erected or altered in an R-4 District shall exceed one (1) story in height or fifteen (15) feet, except as provided in Article XIX of this Zoning Ordinance.

### Section 1 1.03 - Space requirements.

- (a) The minimum unit area of premises used or occupied by each trailer shall be two thousand five hundred (2,500) square feet, clearly defined on the ground by stakes, posts, or other markers, except that where a separate parking area is provided on the trailer camp lot for motor vehicles and no motor vehicles are parked on the trailer unit area, that the minimum unit area of the premises used or occupied by each trailer shall be two thousand (2,000) square feet, and in such event there shall be provided one (1) parking stall for each trailer unit.
- (b) There shall be unobstructed open spaces between each trailer coach or mobile home of not less than fifteen (15) feet and not less than ten (10) feet of unobstructed open space between the ends of adjacent trailer coaches. Hitches shall not extend beyond the boundary lines of the sites, except

where such parking space is provided in street in accordance with Schedule of Road Widths in Article XI.

- (c) No trailer shall be located closer than twenty-five (25) feet from the right-of-way line of a main highway, or ten (10) feet from the mobile court or trailer camp property line.
- (d) One passenger motor vehicle may be parked on the private street in front of the trailer coach site, provided it complies with the Schedule of Road Widths, in Article XI, of this Ordinance, and provided further additional off-street parking space of one-half (h) parking stall per trailer unit is provided within the trailer coach park for additional private passenger vehicles which belong to the occupants of the trailers and for visitors' cars. (e) Each trailer space or site shall be provided with a concrete apron or concrete ribbons, not less than twentyfour (24) inches wide, upon which the trailer shall be located.

#### Section 1 1.04 - Roads and sidewalks.

8/22/22, 2:15 PM

Warren, MI Code of Ordinances

Each individual trailer coach site shall abut or face a driveway, roadway, or street of at least thirty (30) feet in width which street shall have unobstructed access to a public street or highway. Existing licensed trailer parks shall not be required to increase the width of the streets within said parks to thirty (30) feet as long as said parks are not redesigned or altered. All such roadways shall be hard surfaced.

Each trailer coach park shall provide a thirty (30) inch concrete walk from the entrance of each trailer to all required service facilities.

Roadways and streets within all existing trailer coach parks shall conform to the following schedule regarding vehicle traffic use, including motor vehicle parking.

Motor Vehicle Parking Allowance	Traffic Use	Min. Rd. Width
1. No parking on road (Separate lot or on-site parking provided)	2-way road	20 feet
2. Parallel parking, 1 side only	1-way road	20 feet
3. Parallel parking, 2 sides	1-way road	26 feet
4. Parallel parking, 2 sides	2-way road	36 feet

Where sidewalks are provided, the space required shall be in addition to the above schedule.

#### Section 1 1.05 - Plumbing and electrical installations.

Plumbing and electrical installations in R-4 Districts shall be maintained in accordance with the City of Warren

Plumbing and Electrical Codes.

#### Section 1 1.06 - Additional requirements.

In addition, all trailer coach parks shall comply with the following:

- (a) There shall be provided an area of not less than one hundred (100) square feet for recreation, for each trailer space in the Mobile Home Park, with a minimum area of not less than five thousand (5,000) square feet, which shall be no longer than two (2) times its width. Such area shall be developed and maintained

by the management so as to provide healthful recreation for the children of the Mobile Home Parke

- (b) A greenbelt planting strip, not less than eight (8) feet in width, shall be located along all lot lines not bordering a street. Such greenbelt shall be composed of one (1) row of deciduous and/or evergreen trees, spaced not more than four (4) feet apart and not less than one (1) row of shrubs spaced not more than eight (8) feet apart and which grow at least to a height of five (5) feet or more after one (1) full growing season and which shrubs will eventually grow to a height of not less than twelve (12) feet. A fence may be built on the trailer coach park property lines, in lieu of a greenbelt as heretofore required, said fence shall be not less than four (4) feet nor more than six (6) feet in height, constructed of woven wire or open metal or wood pickets and no barbed wire shall be used in the construction of said fence.
- (c) The front yard and the side yard adjacent to a street shall be landscaped and the entire Mobile Home Park shall be maintained in a good, clean presentable condition at all times.
- (d) No business of any kind shall be conducted in any mobile home, trailer or building or on the premises of the Mobile Home Park, except that of the management office.
- (e) Street and yard lights, sufficient in number and intensity to permit the safe movement of vehicles and pedestrians at night, shall be provided and shall be effectively related to buildings, trees, walks, steps, and ramps.
- (f) All fuel oil and all gas tanks shall be located on each trailer site in a uniform manner. All tanks shall be of an approved type to comply with building code standards and shall be equipped with vent pipes and with fused valves. All tanks shall be elevated on non-combustible stands and placed on a concrete base. (g) There shall be no storage underneath any trailer and each trailer site shall be maintained in a clean and presentable condition at all times.
- (h) Fences other than those surrounding the park shall be uniform in height and shall not exceed thirty (30) inches in height and shall be constructed in such a manner as to provide firemen access to all sides of each trailer.
- (i) Fire hydrants of a size and pressure to be used by the City of Warren Fire Department shall be placed within said trailer park so that no trailer shall be more than six hundred (600) feet from a fire hydrant.

(j) A one family dwelling may be permitted on the site provided that such dwelling is limited to the management's residence and provided further, such dwelling complies with the requirements of the R-1 D Districts of the Ordinance. A portion of such dwelling may be utilized for management's office.

(k) Reserved.

(Ord. No. 30-945, S 4, 4-27-04)

Cross reference— License fee schedule, S 18-18.

# **APPENDIX D: Parking Requirements**

Section 4.32 - Off-street parking requirements.

In all zoning districts, off-street parking facilities for the storage or parking of self-propelled motor vehicles for use of occupants, employees, and patrons of the buildings hereafter erected, altered or extended after the effective date of this Ordinance, shall be provided and maintained as herein prescribed.

- (a) Loading spaces as required in Section 4.31 shall not be construed as supplying off-street parking space.
- (b) When units of measurements determining the number of required parking spaces result in requirement of a fractional space, any fraction up to and including one-half (h) shall be disregarded and fractions over one-half shall require one (1) parking space.
- (c) Whenever a use requiring off-street parking is increased in floor area, and such use is located in a building existing on or before the effective date of this Ordinance, additional parking space for the additional floor space shall be provided and maintained in amount hereafter specified for that use.
- (d) Repealed as per Ordinance No. 30-294. The effect of this amendment is to require the computation of off street parking spaces based upon total gross floor area as defined in Section 2.20 of Article II, Definitions of said Ordinance No. 30.
- (e) Off-street parking facilities for one, two or multi-family dwellings shall be located on the same lot or plot of ground as the building they are intended to serve.

The location of required off-street parking facilities for other than one, two or multi-family dwellings shall be within three hundred (300) feet of the building they are intended to serve, measured from the nearest point of the off-street parking facilities and the nearest point of the building, provided the property on which the building is located shall not prohibit an industry which employs five hundred (500) or more employees from the supplying [of] off-street parking at a reasonable distance, greater than three hundred (300) feet from the building, in which said

employees are employed, upon approval of the Planning Commission, and provided such parking lot is owned by the owner of the property on which the industrial plant is located.

- (f) In the case of a use not specifically mentioned, the requirements of off-street parking facilities for a use which is so mentioned and said use is similar shall apply.
- (g) Nothing in this section shall be construed to prevent collective provisions of off-street parking facilities for two or more buildings or uses, provided collectively, such facilities shall not be less than the sum of the requirements for the various individual uses computed separately in accordance with the table.
- (h) The amount of required off-street parking space for new uses or buildings, additions thereto and additions to existing building as specified above shall be determined in accordance with the following table, and the space, so required shall be stated in the application for a building permit and shall be irrevocably reserved for such use.

Use	Required Parking Space
(1) One and two family dwellings	One (1) parking space for each family unit.

(2) Multiple dwellings and efficiency apartments.

(4) Convalescent homes and homes for the aged or similar uses.

(2B) All multiple dwellings and efficiency apartments in R-5 zones.

(5) Orphanage or similar use.

(6) Hotels.

(7) Private Clubs, Fraternities, boarding and lodging business.

unloading space for ambulances and the like shall not be included herein.

(8) Community centers, libraries, museums, post offices, civic clubs, etc.

One (1) parking space for each ten (10) beds.

(9) Theaters and Auditoriums (other than incidental to schools).

One (1 ) parking space for each three (3) guest rooms, plus one (1) additional space for each five (5) employees.

Two (2) parking spaces per dwelling unit\* Where community or recreation type building has been included within the site plan there shall be provided one off-street parking space for each fifty (50) square feet of floor area for said building.

One (1) parking space for each two (2) guest bedrooms.

Provide about each building an improved area other than the front yard which shall be sufficient in size to provide adequate facilities for parking as approved by the Planning Commission.

See Section 1 OA.02(e) and IOA.03(a).

One (1) parking space for each three (3) patient beds; plus one (1) space for each staff or visiting doctor; plus one (1 ) space for each four (4) employees, including nurses. Loading and

One (1 ) parking space per seat for first fifty (50) seats and one (1) parking space for each four (4) seats for all seats over fifty (50) seats.

(10) Elementary and Junior High Schools.

(1) High Schools and Colleges

One (1 ) parking space for each two (2) employees (including teachers and administrators), plus sufficient off-street space for the safe and convenient loading and unloading of students.

(12) Dance halls, pool and billiard rooms, assembly halls and exhibition halls without fixed seats.

One (1 ) parking space for each two (2) employees (including teachers and administrators) and one (1) for each ten (10) students, in addition to the requirements of the auditorium.

(13) Stadiums and sports arenas.

(14) Bowling Alleys.

One (1) parking space for each three hundred (300) square feet of gross floor area.

(15) Churches.

(16) Mortuaries or funeral homes.

One (1 ) parking space for each four (4) seats.

(17) Establishment for sale and consumption on the premises of alcoholic beverages, food or refreshments.

Six (6) parking spaces for each alley; plus one (1 ) space for each one (1 ) employee.

(18) Medical or dental clinics.

One (1) for each three (3) seats in the main unit of worship. Where individual seats are not provided, each (20) inches of bench shall be considered as one (1) seat.

One (1 ) parking space for each fifty (50) square feet of floor space in the slumber rooms, parlors or individual funeral service rooms.

One (1) parking space for each two hundred (200) square feet of floor area.

One (1 ) parking space for each one hundred fifty (150) square feet of gross floor area  
(19) Banks, business or professional offices.

(20) Furniture and appliance stores, personal service shops (not including beauty parlors and barber shops), household equipment or furniture repair shops, clothing or shoe repair or srvice shops, hardware stores, motor

vehicle sales, wholesale stores and machinery sales.

(21) Beauty parlors and Barber shops.

(22) All retail stores, martial arts and yoga studios, except as otherwise specified herein.

(23) Industrial establishments, including manufacturing, research and testing laboratories, creameries, bottling works, printing and engraving shops, warehouse and storage buildings.

(24) Amusement Machines

(25) Senior Citizen Housing  
A. One (1) parking space for each two hundred (200) square feet of gross floor area.  
B. Three and one-half (3%) stories minimum. Calculated as follows: Gross floor area of building (out-to-out

dimensions of building) multiplied by the factor 80% and that result divided by two hundred (200), which result will give parking requirement.

One (1 ) parking space for each five hundred (500) square feet of floor area.

One and one quarter (1.25) parking spaces for each beauty and/or barber shop chair.

One (1) parking space for each three hundred (300) square feet of gross floor area.

One (1 ) parking space for each one thousand two hundred 1 , 200 square feet of gross floor area

One (1 ) parking space shall be provided for each amusement machine (as defined in Section 3501 , Code of Ordinances), in addition to the parking requirements for the commercial use in which the amusement machine is located.

One (1) parking space per dwelling unit.

(26) Hospitals and Sanitoriums.	Three (3) spaces per bed for all hospitals (including psychiatric, medical, both private and public), except if hospital has ambulatory out-patient service and/or educational training programs, then four (4) spaces per bed.
(27) Sexually oriented businesses	One (1) parking space for each three hundred fifty (350) square feet of net floor area, as defined in <u>Section 6-77</u> of the Warren Code of Ordinances.

(i) All spaces that abut a continuous curb required in accordance with Section 16.07 of this Ordinance or a common property line shall be laid out in the following dimensions, including off-street maneuvering lanes:

Type	Width	Length	Length of Maneuvering Lane
90°	9'	22'*	22'
60°	9'	20'*	20'
45°	9'	19'*	17'
Parallel	12'*	20'	15' one-way
			20' two-way

All spaces that abut a common property line where a continuous curb is not required shall provide one protective bumper curb per parking space. Said bumper curb shall be placed no closer than five feet from the property line.

Type	Width	Length	Length of Maneuvering Lane
90°	9'	20'*	22'
60°	9'	18'*	20'
45°	9'	17'*	17'
Parallel	10'*	20'	15' one-way
			20' two-way

All spaces that do not abut a continuous curb required in accordance with Section 16.07 or a common property line shall be laid out in the following dimensions:

\*Measured from the front of the stall on a perpendicular line.

- (j) All requests and applications for building permits for structures or uses other than one and two-family dwellings requiring off-street parking shall be accompanied by plans identifying the parking stalls, their widths and lengths, maneuvering area, and points of ingress and egress.
- (k) All off-street parking areas shall be provided with adequate ingress and egress, shall be hard surfaced with concrete or plant-mixed bituminous material (base may be stabilized gravel or equivalent), shall be maintained in a usable dustproof condition, shall be graded and drained to dispose of all surface water, provide protective bumper curbs as per Sections 4.32 (i) and 16.07, and shall otherwise comply with Section 2.46 and 16.05 of this Ordinance.

(Ord. No. 30-287, S 3, 8-13-68; Ord. No. 30-294, S 1, 9-24-68; Ord. No. 30-367, S 1, 4-13-71; Ord. No. 30-444, S 1, 8-14-73; Ord. No. 30-457, S 4, 2-12-74; Ord. No. 30-462, S 2, 7-9-74; Ord. No. 30-485, 1, 2, 6-10-75; Ord. No. 30-489, §§1, 2, 7-22-75; Ord. No. 30-500, S 4, 1-27-76; Ord. No. 30-559, S 2, 5-9-78;

Ord. No. 30-627, S 1, 1 1-12-80; Ord. No. 30657, S 3, 4-12-83; Ord. No. 30-1002, S 2, 10-22-13; Ord. No. 30-1005, S 1, 7-9-14; Ord. No. 30-1071, S 1, 2-8-22)

# **APPENDIX E: Nonconforming Section**

- (a) Non-Conforming Use-Continuance. Any lawful non-conforming use consisting of a building or land usage existing at the time of the effective date of this Ordinance may be continued, except as herein prohibited or restricted, provided that the building or use thereof shall not be structurally changed, altered or enlarged, unless such altered or enlarged building or use shall conform to the provisions of this Ordinance for the district in which it is located. No nonconforming use if changed to a use permitted in the district in which it is located shall be resumed or changed back to a non-conforming use. Failure to continue to use any land, building or structure, or part thereof, which use is a non-conforming use under this Ordinance, for a period of one (1) year or more shall be held to be conclusive proof of an intention to legally abandon any such non-conforming use.
- (b) Non-Conforming Use-Restoration. Nothing in this Ordinance shall prevent the restoration, repairing, or rebuilding of any non-conforming building or structure damaged to the extent of sixty (60) percent or less of its valuation by fire, explosion, act of God, or any act of the public enemy, subsequent to the effective date of this Ordinance, or shall prevent the continuance of the use of such building or part thereof, as such use existed at the time of such impairment of such building or part thereof.
- (c) Non-Conforming Use-Repair. Nothing in this Ordinance shall prevent the repair, reinforcement or reconstruction of a non-conforming building, structure, or part thereof existing at the effective date of this Ordinance, rendered necessary by wear and tear, deterioration or depreciation, provided the cost of such work shall not exceed thirty (30) percent or [of] the valuation of such building or structure at the

time such work is done nor shall any provision of this Ordinance prevent compliance with the provisions of any Building Code in effect in this City or the Housing Law of Michigan relative to the maintenance of buildings or structures.

- (d) Non-Conforming Use-Exceptions. Nothing in this ordinance shall prohibit the alteration, improvement, or rehabilitation of a no-conforming building or structure existing at the effective date of this Ordinance, provided the same does not involve any increase in height, area, bulk, or change or use. Nothing in this Ordinance shall prevent the strengthening or restoration of any building or wall declared unsafe by the Building Department.
- (e) Non-Conforming Use-Removal. In accordance with Act No. 207, Public Acts of Michigan 1921 [MCL 125.581 et seq.], as amended by Section 3a of Act No. 272 of the Public Acts of Michigan, 1947 [MCL 125.583a], the City Council may acquire by purchase, condemnation or otherwise, private property for the removal of non-conforming uses and structures; provided, the property shall not be used for public housing. The City Council may in its discretion provide that the cost and expense of acquiring such private property be paid from general funds, or the cost and expense or any portion thereof be assessed to a special district. The elimination of such non-conforming

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uses and structures in a zoned district as herein provided is hereby declared to be for a public purpose and for a public use. The City Council shall have the authority to institute and prosecute proceedings for the condemnation of non-conforming uses and structures under the power of eminent domain in accordance with the laws of the State of Michigan and the provisions of the City Charter relative to condemnation.

(Ord. No. 30-124, S 1, 6-9-64)

# **APPENDIX E: Definitions**

## ARTICLE II. - DEFINITIONS

For the purpose of this Ordinance certain terms and words are herewith defined:

Words used in the present tense include the future tense, words in the singular number include the plural number, and words in the plural number include the singular number; the word "building" includes the word "structure", and the word "shall" is always mandatory and not merely directory.

Footnotes:

Cross reference— Definitions and rules of construction generally, S 1-2.

### Section 2,01 - Alley,

A way open to public travel intended for secondary access to premises and not less than eighteen (18) feet wide, but not more than thirty (30) feet wide.

### Section 2.02 - Basement.

That portion of a building which is wholly or partly below the average grade of the ground level adjoining the building when the height from the grade up to the first floor tier of floor beams or joists is less than the height from the grade level down to the floor, provided, however, that if the height from the grade level to the first tier of floor beams or joists is five (5) feet or more, such basement shall be considered a story.

### Section 2.03 - Boarding or rooming house.

A boarding or rooming house shall be construed to mean any dwelling occupied in any such manner that certain rooms in excess of those used by members of the immediate family and occupied as a home or family unit, are leased or rented to persons outside of the family, without any attempt to provide therein or therewith cooking or kitchen accommodations.

### Section 2.04 - Building department.

References throughout this ordinance to the Building Department shall mean the Division of Building and Safety

Engineering, and the Director of Public Service or any of his duly appointed representatives, including the Building

Director or any of his subordinate officers or employees.

(Ord. No. 30-994, S 1, 12-13-1 1)

#### Section 2.05 - Building,

Any structure, either temporary or permanent, having a roof, and used or built for the shelter or enclosure of any person, animal, chattel or property of any kind. This shall include tents, awnings, or vehicles situated on private property and used for purposes of a building.

#### Section 2.06 - Building-principal.

A building in which is conducted the main or principal use of the lot on which said building is situated.

#### Section 2,07 - Building-accessory.

A subordinate building or structure on the same lot, or part of the main building, occupied by or devoted exclusively to an accessory use.

#### Section 2.08 - Building line.

The front line of the building or the legally established line which determines the location of the building with respect to the street line.

#### Section 2.09 - Carport.

A partially open shelter or structure for housing of vehicles. Such structures shall comply with all yard requirements applicable to garages.

## Section 2.10 - Court.

A court is an open unoccupied space other than a yard, and bounded on at least two sides by a building. A COURT extending to the front lot line or front yard, or to a rear lot line or rear yard is an OUTER COURT. Any other court is an INNER COURT.

## Section 2.1 1 - District.

Any section of the incorporated parts of the City of Warren for which the regulations governing the use of buildings and premises or the height and area of buildings are uniform.

## Section 2,12 - Dwelling unit.

A building, or portion thereof, designed for occupancy by one (1 ) family for residential purposes and having cooking facilities.

## Section 2.13 - Dwelling, one-family.

A building designed for and occupied by one (1 ) family, and so designated and arranged as to provide cooking and kitchen accommodations and sanitary facilities for one (1 ) family only.

## Section 214 - Dwelling, two-family.

A building designed for and occupied by two (2) families, and so designated and arranged as to provide cooking and kitchen accommodations and sanitary facilities for each of the two (2) families only.

## Section 215 - Dwelling, multiple-family.

A building or portion thereof, designed for occupancy by three (3) or more families living independently of each other and having separate cooking and kitchen accommodations and sanitary facilities.

## Section 2,16 - Efficiency apartment.

A dwelling unit consisting of not more than two (2) rooms in addition to kitchen and necessary sanitary facilities.

Section 2,17 - Essential services.

The phrase "essential services" means the erection, construction, alteration or maintenance by public utilities or municipal departments or commissions of underground or overhead gas, electrical, communication, steam, or water transmissions or distribution systems, including towers, poles, wires, mains, drains, sewers, pipes, conduits, cables, fire alarm boxes, police call boxes, traffic signals, hydrants, and other similar equipment and accessories in connection therewith (but not including buildings) reasonably necessary for the furnishing of adequate service by such public utilities or municipal departments or commissions for the public health, safety or general welfare.

Section 2.18 - Family.

A family is any number of persons living together in a dwelling comprising a single nonprofit housekeeping unit and related by blood, marriage, adoption, domestic partnership. A family shall include not more than three (3) persons not so related occupying a dwelling and living as a single nonprofit housekeeping unit. With the exceptions of domestic employees and of any individual with a disability as defined in Title VIII of the Civil Rights Act of 1968, as amended by the Fair Housing Amendments Act of 1988.

(Ord. No. 30-1036, S 1, 4-24-18)

Section 2,19 - Farm,

A farm is a platted or unplatted parcel of land not less than three (3) acres.

Section 2.20 - Floor area.

Floor area shall mean the total gross floor area, as measured to the outside surfaces of exterior walls, but not including the following spaces: crawl spaces, unfinished and non-

habitable portions of the basement and attics, garages and open porches, balconies and terraces.

#### Section 2.21 - Garage-community.

A community garage is a structure, or a series of structures, for the storage of motor vehicles, having no public shop or services in connection therewith, and separated into compartments or sections with separate vehicular entrances, for the use of two or more owners or occupants of property in the vicinity.

All such garages intended to accommodate more than four (4) vehicles shall first receive the approval of the

Board of Appeals.

#### Section 222 - Garage-private.

A private garage is a structure for the storage of not more than a number of vehicles as may be required in connection with the permitted use of the principal building.

#### Section 2,23 - Garage-public.

A public garage is a structure, other than a private or community garage, for the storage, care, repair or refinishing of motor vehicles, except that a structure or room used solely for the display and sale of such vehicles in which they are not operated under their own power, and in connection with which there is no repair, maintenance, or refinishing service or storage of vehicles other than those displayed, shall not be considered a garage for the purpose of this Ordinance.

#### Section 2.24 - Gasoline service station.

A gasoline service station is a building or structure designed or used for the retail sale or supply of fuels, lubricants, air, water, and other operating commodities for motor vehicles, and including the customary space and facilities for the installation of such commodities on or in

such vehicles, but not including space for facilities for storage, repair, bumping, painting and refinishing.

#### Section 2.25 - Grade.

The elevation of the curb at the midpoint of the front of the lot or tract, as established by the Director of Public Service.

#### Section 2.26 - Greenbelt.

(a) An eight (8) foot greenbelt shall be a solid planting strip composed of evergreen trees spaced not more than twenty (20) feet apart and not less than one (1) row of evergreen shrubs, spaced not more than five

(5) feet apart and which are at least five (5) feet or more in height after one (1) full growing season after planting, and which shall be planted and maintained in a healthy growing condition by either the occupant or owner of the property.

(b) A twenty (20) foot greenbelt shall be a planting strip composed of two (2) rows of evergreen trees, spaced alternately at not more than twenty (20) feet apart and not less than three (3) rows of evergreen shrubs, spaced at not more than eight (8) feet apart and which are at least five (5) feet or more in height after one (1) full growing season after planting, and which shrubs will eventually grow to a height of not less than twelve (12) feet at maturity, and which shall be planted and maintained in a healthy growing condition by either the occupant or owner of the property.

A decorative masonry wall, not more than six (6) feet in height and not less than eight (8) inches in thickness may be substituted for either of the above greenbelts, upon approval of the Planning Director, and shall be maintained in an attractive condition and structurally sound.

(c) The occupant or owner shall maintain greenbelt in an attractive well-trimmed condition at all times, and free from litter, refuse and weeds.

(Ord. No. 30-227, S 1, 1 1-22-66; Ord. No. 30-998, S 1, 7-9-13)

#### Section 2.27 - Group housing.

A residential development involving the ultimate construction of two (2) family dwellings or multiple-family or combination of multiple and two (2) or one (1 ) family dwellings, on a lot, parcel or tract of land, or on a combination of lots under one ownership.

#### Section 2.28 - Height of buildings.

The vertical distance from the ground level adjoining the building to the highest point on the roof surface in the case of a flat roof, to the deck line for mansard roofs, to the mean height level between eaves and ridge for gable, hip or gambrel roofs.

#### Section 2.29 - Home occupation.

Any occupation or profession carried on only by a member of a family, residing on the premises, in connection with which there is used no sign other than one (1) non-illuminated name plate attached to the building entrance which is not more than one (1) square foot in area; provided that:

- (a) No commodity is sold upon the premises;
- (b) No person is regularly employed for commercial purposes other than a member of the immediate family, residing on the same premises;
- (c) No mechanical equipment is used except such as is normally used for domestic or household purposes, but this shall not include the office of a veterinarian;
- (d) No more than twenty-five (25) percent of the total floor area is to be used for home occupation.

#### Section 2,30 - Hotel.

A building containing twenty-five (25) or more apartments, each composed of bedroom, bathroom, and closet space, but without cooking facilities, with the exception of the units

occupied by the management staff, the apartment units being used for the accommodation of transient guests and no cooking being permitted therein, and containing a public dining room for the accommodation of at least twenty-five (25) guests, and a general kitchen.

Section 2.31 - Kennel.

A kennel shall be considered a lot or premises at which three (3) or more dogs are kept either permanently or temporarily.

Section 2,32 - Lot.

A parcel of land separated from other parcels or portions by descriptions as in a subdivision or on a record survey map or by metes and bounds for purpose of sale, lease, or separate use and undivided by any street and occupied by, or designated to be developed for, one (1) building or principal use and the accessory buildings or uses customarily incidental to such building, use or development include such open spaces and yards as are designed and arranged or required by this ordinance for such building, use or development.

(Ord. No. 30-726, S 1, 9-23-86)

Section 2.33 - Lot-corner.

A corner lot is a lot of which at least two (2) adjacent sides abut for their full length upon a street.

Section 2.34 - Lot—Double frontage.

Double frontage lot is a parcel of land which extends from one street to another street.

Section 2,35 - Lot-interior.

An interior lot is a lot other than a corner lot.

Section 2,36 - Lot line—Front.

The line abutting a street. On a corner lot the shorter street line shall be considered the front lot line. Where new street lines are established by Ordinance on the Master Thoroughfare Plan of the City of Warren, such lines shall be the front lot line.

#### Section 237 - Lot line—Rear.

The rear lot line is that boundary which is opposite and most distant from the front lot line. In the case of a lot pointed at the rear, the rear lot line shall be that assumed line parallel to the front lot line not less than ten (10) feet long, lying most distant from the front line and wholly within the lot.

#### Section 238 - Lot line-side.

A side lot line is any lot boundary line not a front lot line or a rear lot line. A side lot line separating a lot from a street is a side street lot line. A side lot line separating a lot from another lot or lots is an interior lot line.

#### Section 2,39 - Lot depth.

The perpendicular distance between the front and rear lines, measured along the median between the side lot

#### Section 2.40 - Lot width.

The horizontal distance between the side lot lines measured at the two points where the building line, or setback, intersects the side lot lines.

#### Section 2.41 - Lot of record.

A parcel of land, the dimensions of which are shown in a recorded plat on file with the County Register of Deeds, or any parcel which has been created in accordance with the provisions of the Plat Act [MCL 560.101 et seq.], and which has been assigned a parcel number

by the Land File Division of the Macomb County Treasurer<sup>1</sup>'s Office and the description for which is on file with the City Assessor's Office.

(Ord. No. 30-726, S 2, 9-23-86)

#### Section 2.42 - Mobile home park.

A mobile home or trailer coach park refers to any site, lot, field, or tract of land upon which three (3) or more occupied mobile homes or trailer coaches are harbored, either free of charge or for revenue purposes, and shall include any building structure, tent, vehicle, or enclosure used or intended for use as a part of the equipment of such mobile home or trailer coach park.

#### Section 2.43 - Motel or motor court.

A motel or motor court is a business comprising of a series of attached, semi-detached or detached rental units for the overnight accommodation of transient guests, each unit containing bedroom, bathroom and closet space, but no kitchen or cooking facilities, with the exception of units for use of the manager and/or caretaker.

#### Section 2.44 - Occupied mobile home.

An occupied mobile home or trailer coach refers to any mobile home or trailer coach located on a site within the mobile home park when such mobile home is connected to any park facility such as a sewerage collection system, water or electrical distribution system.

#### Section 2.45 - Outlot.

An outlot is a parcel of land which must be designated on a recorded plat as an outlot before it may be legally considered as such.

#### Section 2.46 - Parking space.

An area surfaced by use of either bituminous, oil aggregate, stabilized gravel or equivalent, enclosed or unenclosed, not less than nine (9) feet wide by twenty (20) feet long, except as regulated by Section 4.32 (i) of this Ordinance.

(Ord. No. 30-457, S 2, 2-12-74)

#### Section 2.47 - Public utility.

Any person, firm, corporation, municipal department or board duly authorized to furnish, and furnishing to the public, under municipal regulations, electricity, gas, steam, telephone, telegraph, transportation or water.

#### Section 2.48 - Soil.

The word soil as used herein shall be topsoil, subsoil, sand[,] gravel, muck or any other type of natural earthy material.

#### Section 2.49 - Story.

That portion of a building included between the surface of any floor and the surface of the floor next above, or if there should be no floor above, then the space between the surface of any floor and the ceiling next above.

A basement shall be considered a story if the distance from the building grade line to the ceiling is equal to or greater than the distance from the building grade line to the floor or if its ceiling is over five (5) feet above the average established grade, or if it is used for business purposes by other than a janitor or domestic servant in the same building.

(Ord. No. 30-127, S 1, 7-14-64; Ord. No. 30-131, S 1, 7-14-64)

#### Section 2.50 - Story-half.

A half story is an uppermost story lying under a sloping roof, the usable floor area of which does not exceed seventy-five (75) percent of the floor area of the story immediately below it,

and not used, or designed, arranged or intended to be used, in whole or in part, as an independent housekeeping unit or dwelling.

Tri-level and quad-level buildings shall be considered one and one-half (1 1/2) stories if the lower floor area is considered a story as in Section 2.49.

Bi-level shall be considered two (2) stories, if one of the lower floor areas is considered a story as in Section 2.49.

#### Section 2.51 - Street.

A street is any thoroughfare or way, other than public alley, dedicated to the use of the public and open to public travel, whether designated as a road, avenue, highway, boulevard, drive, lane, circle, place, court, terrace, or any similar designation, or a private street open to restricted travel at least thirty (30) feet in width.

#### Section 2.52 - Structure.

Anything constructed or erected, the use of which requires location on the ground or attachment to something having location on the ground.

#### Section 2.53 - Tourist home.

A dwelling furnishing over-night sleeping quarters to transient guests, containing not more than three (3) guest bedrooms.

#### Section 254 - Trailer coach or mobile home.

A vehicle with or without its own motive power, equipped for or used for living purposes and mounted on wheels or designed to be so mounted and transported.

#### Section 2.55 - Utility room.

A utility room, or space, is a room or space located other than in the basement, specifically designed and constructed to house any home utilities such as the heating unit and laundry facilities.

#### Section 2.56 - Use.

The purpose for which land or buildings thereon are designed, arranged, or intended to be occupied or used, or for which they are occupied or maintained.

#### Section 2.57 - Use-accessory.

A use normally incidental to, and subordinate to, the principal use of the premises.

#### Section 2.58 - Yard-front.

A front yard is an open space extending the full width of an interior lot and/or full length of all sides bordering upon a street or streets of a corner lot and of a uniform depth measured horizontally at right angles to the street lot line, unoccupied from the ground upward, except as hereinafter specified.

#### Section 259 - Yard-rear.

A rear [rear] yard is an open space extending the full width of a lot and of a uniform depth measured horizontally at right angles to the rear lot line and unoccupied from the ground upward, except as hereinafter specified.

#### Section 2.60 - Yard-side.

A side yard is an open space, extending from the front yard to the rear [rear] yard, and of a uniform width measured horizontally at right angles to the side lot line and unoccupied from the ground upward, except as hereinafter specified.

#### Section 2.61 - Outdoor retail sales.

The display and sale of products and services on a lot outside of a building including products and services that are displayed year round and those such as Christmas trees and flowers that are displayed and sold on a temporary or seasonal basis, excluding garage sales

that are otherwise regulated in this Ordinance. (Ord. No. 30-283, S 1, 6-25-68; Ord. No. 30-835, S 1, 2-22-94; Ord. No. 30-858, S 1, 2-13-96)

#### Section 2.62 - Driveways.

A driveway shall be hard surfaced access connecting such parking space with a street or alley and permitting ingress and egress of a motor vehicle.

(Ord. No. 30-457, S 3, 2-12-74)

#### Section 2.63 - Coin-operated amusement machine and/or device establishments.

Coin-operated amusement machine and/or device establishments shall be defined as a place of business that has in operation an excess of five (5) coin-operated machines and/or devices.

(Ord. No. 30-462, S 1(2.63), 7-9-74)

#### Section 2.64 - Coin-operated amusement machine and/or device.

A coin-operated amusement machine and/or device means a ski-ball machine, air-hockey machine, motion picture machine, shuffleboard, miniature pool table, or any other similar machine, instrument, or contrivance which may be operated or set in motion upon the insertion of a coin, or under normal use is designed to have a coin; however, in lieu of said coin, the proprietor charges a flat rate to use said device.

(Ord. No. 30-462, S 1(2.64), 7-9-74)

#### Section 2.65 - Senior citizen housing.

A residential building containing eight (8) or more dwelling units specially designed for the use and occupancy of any person married or single, who is sixty-two (62) years of age or over. Such building shall not contain equipment for surgical care or for the treatment of disease or injury, other than for emergency first-aid care. Such building shall be:

- (1) Owned by the City of Warren and administered by the Warren Housing Commission in accordance with Warren Code of Ordinances, Chapter 4, Section 1 0-41, et seq.; or,
- (2) Constructed with the assistance of mortgage financing or other financial assistance insured by or procured through or with the assistance of municipal, State or Federal governmental agencies, and is constructed and maintained on a non-profit basis by a charitable organization which is organized pursuant to the provisions of the Michigan's General Corporation Act (P.A. 1931 No. 327).

(Ord. No. 30-469, S 1, 9-24-74)

Footnotes:

Editor's note— This act has been repealed Refer now to the Business Corporation Act, P.A. 284 of 1972 (MCL 450.1101 et seq.).

#### Section 2.66 - Medical clinic.

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Medical Clinic shall mean any facility providing physical or mental health service or medical or surgical care of the sick or injured but shall not include in-patient or overnight accommodations. Medical clinic includes health center, health clinic, and doctors offices.

(Ord. No. 30-538, S 1, 6-14-77)

#### Section 2.67 - Shopping center.

A group of commercial establishments, planned, developed, owned and managed as a unit related in location, size, and type of shops to the trade area that the unit serves; it provides on site parking in definite relationship to the types of sizes of stores.

(Ord. No. 30-538, S 2, 6-14-77)

### Section 2.68 - Special land use.

Special land use is a use of land for an activity which, under usual circumstances, would be detrimental to other land uses permitted within the same district but which is permitted because of circumstances unique to the location of the particular use and which use can be permitted conditionally without jeopardy to uses permitted within such district.

(Ord. No. 30-657, S 1, 4-12-83)

### Section 2.69 - Special land use permit.

An authorization by the City Council or Planning Commission specified herein to use a parcel of land and/or structure for a special land use.

(Ord. No. 30-657, S 2, 4-12-83)

### Section 2.70 - Class C liquor license establishment.

A Class C Liquor establishment shall mean any place licensed by the State of Michigan Liquor Control Commission to sell at retail beer, wine, and spirits for consumption on the premises.

(Ord. No. 30-659, S 1, 4-26-83)

State Law reference— Similar provisions, MCL 436.2t.

### Section 2.71 - Tavern.

Tavern shall mean any place licensed by the State of Michigan Liquor Control Commission to sell retail beer and wine for consumption on the premises only.

(Ord. No. 30-659, S 2, 4-26-83)

### Section 272 - Garage sale.

The sale of used tangible household personal belongings to the householder and conducted on an individual lot used as a one-family, two-family, or multiple-family dwelling.

The items offered for sale shall be limited to personal property that is usual to a residence and commonly used in a family.

A garage sale is not for the sale, display, or trading of articles of commerce obtained either new or used for the purpose of sale or resale nor for the sale, display or trading of goods manufactured or processed either on or off the lot for the purpose of sale or resale. The manner of regulation for garage sales as defined herein shall be found in Section 4.42 of this Ordinance.

(Ord. No. 30-680, S 1, 6-26-84)

Sections 2.73—2.75 - Reserved.

Editor's note— Section 2 of Ord. No. 30-859, adopted March 26, 1 996, repealed SS 2.73—2.75 in their entirety. Formerly, SS 2.73—2.75 pertained to the location of on-premises signs, off-premises signs and billboards and derived from SS 1—3 of Ord. No. 30-722, adopted Aug. 26, 1986.

Section 2.76 - Pawnbroker.

Any person, corporation or member, or members of a copartnership or firm, who loans money on deposit, or pledge of personal property, or other valuable thing, other than securities or printed evidence of indebtedness, or who deals in the purchasing of personal property or other valuable thing on condition of selling the same back again at a stipulated price, is hereby defined to be a pawnbroker.

(Ord. No. 30-805, S 1, 12-26-91)

Section 277 - Secondhand dealers.

Any person, corporation or member or members of a corporation or firm who primarily engage in the retail sale of used merchandise, antiques, and secondhand goods; such as, clothing, shoes, furniture, books, rare manuscripts, musical instruments, office furniture, phonographs and phonograph records, store fixtures and equipment.

Excluded from this definition are dealers primarily engaged in selling used motor vehicles, trailers, boats, mobile homes, automobile parts and accessories, scrap and waste dealers.

(Ord. No. 30-805, S 1, 12-26-91)

#### Section 2.78 - Child care center or day care center.

A child care or day care center is a facility, other than a private residence, licensed by the State of Michigan to receive one (1) or more preschool or school-age children for care for periods of less than twenty-four (24) hours a day, unattended by a parent or legal guardian. Child care center or day care center includes a facility that provides care for more than two (2) consecutive weeks, regardless of the number of hours of care per day. The facility is

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generally described as a child care center, day care center, day nursery, nursery school, parent cooperative preschool, play group, before- or after-school program, or drop-in center. Child care center or day care center does not include any of the following:

- (i) A Sunday school, a vacation bible school, or a religious instructional class that is conducted by a religious organization where children are attending for not more than three (3) hours per day for an indefinite period or for not more than eight (8) hours per day for a period not to exceed four (4) weeks during a twelve-month period.
- (ii) A facility operated by a religious organization where children are in the religious organization's care for not more than three (3) hours while persons responsible for the children are attending religious services.
- (iii) A program that is primarily supervised, school-age-child-focused training in a specific subject, including, but not limited to, dancing, drama, music, or religion. This exclusion applies only to the time a child is involved in supervised, school-age child-focused training.

(iv) A program that is primarily an incident of group athletic or social activities for school-age children sponsored by or under the supervision of an organized club or hobby group, including, but not limited to, youth clubs, scouting, and school-age recreational or supplementary education programs. This exclusion applies only to the time the school-age child is engaged in the group athletic or social activities and if the school-age child can come and go at will.

(v) A state licensed family child care home or a state licensed group child care home.

(Ord. No. 30-991, S 1, 2-22-1 1)

#### Section 2.79 - Family child care home.

Family child care home is a private home licensed by the State of Michigan to receive one (1) to six (6) minor children for care and supervision for compensation, for periods of less than twenty-four (24) hours a day, unattended by a parent or legal guardian, except children related by blood, marriage, or adoption to an adult member of the family residing in the home. Family child care home includes a home in which care is given to an unrelated minor child for more than four (4) weeks during a calendar year. A family child care home does not include an individual providing babysitting services for another individual which is exempt from licensing requirements under MCL 722.1 1 1 .

(Ord. No. 30-991, S 2, 2-22-1 1)

#### Section 2.80 - Group child care home.

Group child care home is a private home licensed by the State of Michigan to receive more than six (6) but not more than twelve (12) minor children for care and supervision, for compensation, for periods of less than twentyfour (24) hours a day unattended by a parent or legal guardian, except children related by blood, marriage, or adoption to an adult member of the family residing in the home. Group child care home includes a home in which care is given to an unrelated minor child for more than four (4) weeks during a calendar year.

(Ord. No. 30-991, S 3, 2-22-1 1)

#### Section 2.81 - Antenna.

Any device utilized for the purpose of sending or receiving electromagnetic waves, including but not limited to, microwave, cellular telephone, radio, television, personal communication services or other communications. Citizen radio, short wave, amateur radio, residential TV or satellite TV antennas and towers are excluded from the regulations of this chapter.

(Ord. No. 30-857, S 1, 1-9-96; Ord. No. 30-881, S 1, 10-28-97)

#### Section 282 - Antenna tower.

Any structure which is utilized to support an antenna or antennas, as defined in section 2.81, above the ground or above an existing structure. Antenna towers include, but are not limited to, monopoles, tripods, wood poles, roof mounting brackets, chimney brackets, multiple leg tower structures, signs and self supporting and guy wired towers.

(Ord. No. 30-857, S 1, 1-9-96; Ord. No. 30-881, S 1, 10-28-97)

#### Section 2.83 - Seasonal use.

A temporary use permitted and regulated pursuant to this ordinance for a limited period of time conducted every year at the same time of year, such as, but not limited to, the sale of Easter flowers and Christmas trees.

(Ord. No. 30-858, S 2, 2-13-96)

#### Section 2.84 - Temporary.

Temporary shall mean for the duration of a limited time period as specified in the provisions of this Ordinance.

(Ord. No. 30-858, S 2, 2-13-96)

#### Section 285 - Temporary use.

A use permitted and regulated pursuant to this Ordinance for periods of time that are limited in duration as specified by this Ordinance.

(Ord. No. 30-858, S 2, 2-13-96)

Section 2.86 - Temporary, seasonal or special structure.

A non-permanent structure used in conjunction with the seasonal sale or temporary event pursuant to this Ordinance.

(Ord. No. 30-858, S 2, 2-13-96)

Section 2.87 - Condominium Act.

14/17

Act 59 of 1978, as amended; MCL 559.101 et seq. as amended.

(Ord. No. 30-862, S 1, 4-9-96)

Section 2.88 - [Condominium project, condominium subdivision plan, master deed, common elements, etc.]

Condominium project, condominium subdivision plan, master deed, common elements, and other words and phrases relating to condominiums shall be defined pursuant to Sections 3 to 10 of the Condominium Act, Act 59 of 1978 (MCL 559.103 to 110), (except as otherwise defined and used in Article IVB).

(Ord. No. 30-862, S 1, 4-9-96)

Section 2.89 - Single family site condominium.

All allocation or division of land permitted under the State of Michigan Condominium Act, Act 59 of 1978 as amended, which permits single family detached housing pursuant to a master deed.

(Ord. No. 30-862, S 1, 4-9-96)

### Section 2.90 - Condominium unit.

Condominium unit means that portion of the condominium project designed and intended for separate ownership and use as described in the master deed.

(Ord. No. 30-862, S 2, 4-9-96)

### Section 2.91 - Estate sale.

The sale of used personal property belonging to the occupants of a residential dwelling and conducted on the residential lot to liquidate an estate. The sale shall be conducted by the owner, occupant or agent thereof and shall include viewing time.

(Ord. No. 30-875, S 1, 3-11-97)

### Section 2.92. - Used car lot.

Any property used for the sale, offer for sale, exchange, display, consignment or storage of any passenger motor vehicles, including RV trailers, golf carts, motorcycles, motorized scooter, and other motorized vehicle powered by gas, electricity or battery, that are used, secondhand, previously owned or used, whether or not refurbished, including property used in combination with other uses not stated in this provision. Used car lot excludes automotive manufacturers and new car dealerships, unless the property of the automotive manufacturer and new car dealership is used in combination with a used car lot or used car sales.

(Ord. No. 30-1001, S 3, 8-27-13)

### Section 2.93 - Reserved.

Editor's note— Ord. No. 30-1064, S 1, adopted April 27, 2021, repealed S 2.93, which pertained to medical marijuana facility and derived from Ord. No. 30-1020, S 1, adopted April 12, 2016.

### Section 2.94 - Reserved.

Editor's note— Ord. No. 30-1064, S 1, adopted April 27, 2021 , repealed S 2.94, which pertained to registered qualifying patient or patient and derived from Ord. No. 30-1020, S 1, adopted April 12, 2016.

Section 295 - Reserved.

Editor's note— Ord. No. 30-1064, S 1, adopted April 27, 2021 repealed S 2.95, which pertained to registered primary caregiver or primary caregiver and derived from Ord. No. 30-1020, S 1, adopted April 12, 2016.

Section 2.96 - Reserved.

Editor's note— Ord. No. 30-1064, S 1, adopted April 27, 2021 , repealed S 2.96, which pertained to debilitating medical condition and derived from Ord. No. 30-1020, S 1, adopted April 12, 2016.

Section 2.97 - School.

The buildings, grounds, or facilities, or any portion thereof, owned, occupied by, or under the custody or control of public or private institutions for the primary purpose of providing educational instruction to students at or below the twelfth grade level.

(Ord. No. 30-1020, S 1, 4-12-16)

Section 2.98 - Recreational facility.

Any public building or field used for the primary purpose of sports or recreation.

(Ord. No. 30-1020, S 1, 4-12-16)

Section 2.99 - Library.

A facility in which literary, musical, artistic, or reference materials or items, such as, but not limited to, books, computers, recordings, or videotapes, are kept for the use by or loaning to patrons of the facility, but are not normally offered for sale.

(Ord. No. 30-1020, S 1, 4-12-16; Ord. No. 30-1027, S 1, 5-9-2017)

Section 2.100 - Health club or fitness center.

A facility primarily used for body conditioning and physical exercise, and which involves multiple activities and facilities, including but not limited to weight training, aerobic and related exercise classes, jogging, swimming pools, whirlpool, sauna, steam room, and may include courts for racquet sports occupying a limited area of the facility, generally in the range of less than 10 percent of the building, and may include accessory uses, such as showers, locker rooms, tanning salons and health food sales or fitness screenings, provided they are only in support of the primary uses. A health club or fitness center does not include rehabilitation services provided by licensed health care providers.

(Ord. No. 30-1027, 1, 5-9-2017)

Section 2.101 - Gym or personal fitness center.

An indoor commercial establishment or use where physical exercise or training is conducted on an individual basis, with or without the option for having one-to-one instruction with a personal trainer, using exercise equipment or open floor space, and may have accessory uses provided they are in support of the primary use, but shall not include court sports facilities, swimming pools, and spectator seating for sports.

(Ord. No. 30-1027, S 1, 5-9-2017)

Section 2.102 - Recreational center—Indoor.

An indoor facility, with or without seating for spectators, providing accommodations for individual, organized, or franchised sports, including, but not limited to, basketball, ice hockey, soccer, tennis, volleyball, racquetball, batting cages, water parks, fun ranges, or handball. The facility may also provide other regular organized or franchised events, health and fitness club

facilities, swimming pool, snack bar, restaurant, retail sales of related sport, health or fitness items, and other support facilities, as accessory uses.

(Ord. No. 30-1027, S 1, 5-9-2017)

#### Section 2.103 - Arena recreational center.

An indoor recreational center with main and accessory structures that have a combined maximum gross area of floor space that exceeds 20,000 square feet.

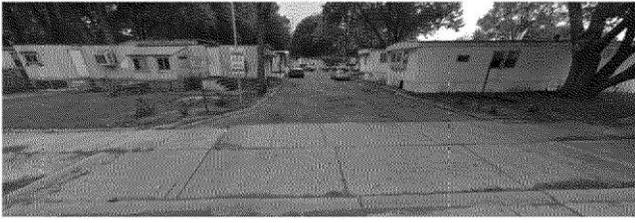
(Ord. No. 30-1027, S 1, 5-9-2017)

#### Section 2.104 - Recreational center—Outdoor.

A commercial business establishment that conducts outside of a building, on a permanent or seasonal basis, in open or partially enclosed or screen facilities, activities designed for participant uses, such as driving ranges, miniature golf, swimming pools, tennis courts, outdoor racquet sports, motorized cart and motorcycle or car tracks, motorized model airplanes, water parks, firing ranges or amusements, such as carnival rides, amusement games, trampolines, or inflatable play equipment or approved as a temporary use.

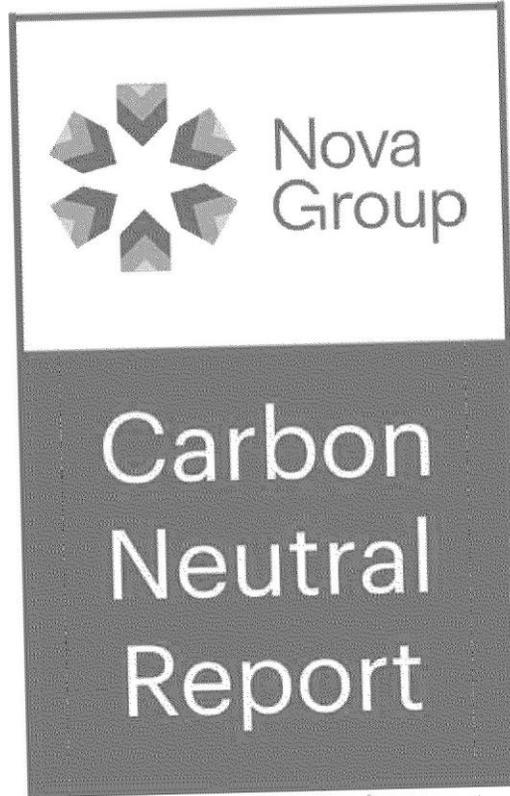
(Ord. No. 30-1027, S 1, 5-9-2017)





1. Street View

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[novagrouppbc.com/carbonneutral](http://novagrouppbc.com/carbonneutral)

# Exhibit E

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF MACOMB

MICHIGAN MANUFACTURED HOUSING ASSOCIATION,

Case No. 25-\_\_\_\_\_ -CZ

Plaintiff

Hon.

CITY OF WARREN,

Defendant.

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AFFIDAVIT OF STEVEN BLANK

STATE OF \_\_\_\_\_

COUNTY OF \_\_\_\_\_

I, Steven Blank, being first duly sworn, states:

1) I have personal knowledge of the facts in this Affidavit or base such knowledge on the business records retained by Blank Family Communities and Continental Mobile Village Mobile Home Park ("Continental" or the "Community") in the ordinary course of business. I am competent to so testify.

2) I am the President and Chief Executive Officer of Blank Family Communities, a third-generation family company that has provided third party management services to manufactured home communities for the past 50 years.

3) Blank Family Communities previously provided management services to Continental, which was a manufactured housing community located in the City of Warren. 4) While doing so, Continental and Blank Family Communities experienced significant issues with

the City's oversight and regulation of Continental which, ultimately, contributed to Continental's inability to continue operating.

5) The City's actions prevented Continental from adding new homes to its community, and from housing residents at the existing homes in its community, leading to a decline in occupancy and, ultimately, contributed to Continental entering into a receivership.

6) Among other things, the City of Warren attempted to enforce a 20-foot setback requirement at the Community. This was improper. Under the Michigan Administrative Code, "[a] community constructed according to the standards in previous acts, rules, or local ordinances shall be maintained or altered in a manner consistent with the standards in effect at the time of original construction, including but not limited to spacing of homes, road widths and sizing and design of community infrastructure." Mich Admin Code R 125.1947a(3). At the time Continental was constructed, a smaller setback requirement was in place, and this setback requirement should have continued to apply at the Community.

7) Due to the City's improper insistence on enforcing a greater setback requirement, Continental was blocked from infilling over 20 lots, preventing the addition of new homes and the expansion of affordable housing opportunities.

8) The City also issued "red tags" (notices of unsafe structure) on many homes within Continental. When doing so, the City failed to comply with its ordinances, which require the City to identify the issue rendering the structure unsafe, provide for the ability to cure the asserted issue, and provide for a hearing to contest the asserted issue.

9) As a result, Continental was precluded from moving new or existing residents into these homes, and it was left without any ability to challenge the City's finding of an unsafe structure. It is my understanding that the City Inspector frequently issued red tags without ever stepping foot inside the homes or otherwise conducting detailed inspections.

10) These actions by the City created significant operational and financial challenges for Continental.

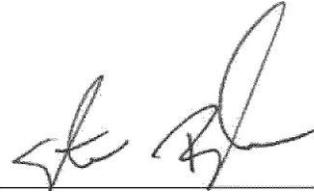
11) Ultimately, the City's actions directly contributed to Continental entering into receivership, leading to the cessation of its operations.

12) The closure of Continental displaced Continental's residents who had been living in the community.

13) The City's actions have caused substantial harm to Continental, its residents, and the availability of affordable housing in the City.

Further affiant sayeth not.

[Signature page follows]



Steven Blank  
President and CEO\$ Blank Family

Subscribed and sworn to by Steven Blank before me on the  
October, 2025.

Signature 

Printed name Amanda Provdakes

Notary public, State of MI, County of Wayne

Communities My commission expires 5/6/31 day

of

AMANDA PROVIDAKES  
Notary Public, State of Michigan  
County of Wayne  
My Commission Expires May 6, 2031  
Acting in the County of Oakland



# Exhibit F

Michigan  
Manufactured  
**HOUSING**  
Association—

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2222 Association Dr. • Okemos, MI 48864 • 517-349-3300 • 1-800-422-6478 • FAX 517-349-3543 •

April 23, 2025

Mr. Jeffrey M. Schroder  
Plunkett Cooney  
38505 Woodward Ave., Suite 100  
Bloomfield Hills, MI 48304

Re:City of Warren Zoning Inspector Blocking Improvements to Housing Opportunities

Dear Mr. Schroder:

I am the President and CEO of the Michigan Manufactured Housing Association (MMHA), and I am writing to you in your capacity as legal counsel for the Warren City Council. The Association's members include manufacturers, community owners, retailers, installers, service providers, and many others servicing the manufactured housing industry. I am writing regarding several member communities' efforts to install new homes in the City of Warren, efforts that unquestionably aid in addressing the housing supply and affordability crises shared nearly universally throughout Michigan. Specifically, although the Mobile Home Commission Act provides that the City may impose only the standards in place at the time a manufactured housing community was developed, the City is blocking communities from installing new homes unless they comply with new standards—in conflict with the Act.

The City's ordinance establishing new setback requirement for manufactured homes is unlawful and unenforceable as applied to any manufactured housing communities

constructed prior to the City enacting that ordinance. In further review of this matter, because the City's setback ordinance established a higher standard than provided under state regulations and the Michigan Mobile Home Commission did not approve that ordinance, the City's recent setback ordinance is invalid pursuant to Section 7 of the Act, MCL 125.2307.

Although the state's current regulations require a 20-foot setback (Administrative Code 125.1941(1)(a)), that regulation does not apply to any manufactured housing community that was constructed where previous regulations were in place:

A community constructed according to the standards in previous acts, rules, or local ordinances shall be maintained or altered in a manner consistent with the standards in effect at the time of original construction, including but not limited to spacing of homes, road widths and sizing and design of community infrastructure... Administrative Code 125.1947a(3).

Simply, a manufactured housing community is required to comply with the spacing requirements as provided by the state and local rules that existed when it was first built; however, the City of Warren continues to deny permitting for home installations unless communities use the City's new requirements.

This matter has been discussed multiple times with several City Attorneys and Deputy City Attorneys, who

Michigan

Manufactured

HOUSING

Association—

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2222 Association Dr. • Okemos, MI 48864 • 517-349-3300 • 1-800-422-6478 • FAX 517-349-3543 •

have consistently expressed agreement and understanding of the applicable state statute and directed zoning officials to follow state law by applying the spacing requirements in

place at the time the communities were developed. Members of the City's zoning inspection staff appear to simply disagree with state law and have continued to deny residents the opportunity for new, safe, affordable housing options by applying an invalid ordinance in conflict with Michigan statute. The issue has unfortunately reached a level of consistency among multiple of our member communities within the City that the Association will soon be faced with an obligation to consider all pathways to resolution, including potential legal action.

My hope is that by calling this to your attention, perhaps members of City Council would be open to education on the impact this matter is having on housing providers and, therefore, Warren residents. I will follow-up with you directly for further communication. In the meantime, if I can provide further information or answer any questions, please do not hesitate to contact me directly at 517.449.0487 or [jlindley@mmhrvca.org](mailto:jlindley@mmhrvca.org).

Thank you in advance for your time.

Best Regards,

A handwritten signature in black ink, appearing to read "J. Lindley". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John D. Lindley, IOM  
President & CEO  
Michigan Manufactured Housing Association

# CHANDLER CAPITAL

VIA EMAIL AND CERTIFIED  
MAIL

Mary Michaels, City Attorney  
City of Warren  
One City Square, Suite 425  
Warren, MI 48093

August 4<sup>th</sup>,  
2025

Re: Formal Demand to Cease and Correct Unlawful Governmental Conduct

Dear Ms. Michaels,

This letter serves as formal notice that the City of Warren's ongoing obstruction of infill, permitting, and rehabilitation efforts at Landmark Estates and Twin Pines manufactured housing communities constitutes multiple ongoing legal violations under federal and state law. If the City does not immediately remedy its conduct, we are prepared to escalate this matter through the filing of a federal discrimination complaint with the Department of Housing and Urban Development (HUD), state regulatory referral, and formal litigation.

We have owned Landmark Estates and Twin Pines for approximately a year. In that timeframe, we have invested more than \$400,000 into community improvements at both properties including utility infrastructure improvements, asphalt/concrete repair and replacement, demolition of run-down homes, tree trimming and removal, painting homes, repairing skirting, and general property clean up. We have an additional \$675,000 in planned improvements, including approximately \$300,000 in escrow earmarked to bring in 15 additional mobile homes to expand the supply of desperately needed affordable housing in Warren, which we have been unable to accomplish due to the City's obstruction.

Despite the considerable time, effort, and resources we have invested in the communities, we have encountered significant resistance from various city officials in the building, zoning, planning, and water departments that have prohibited us from making further improvements and more concerningly, from bringing in additional mobile homes. The City of Warren has a major affordability crisis — despite a waitlist of 50 people seeking affordable housing in our communities, we have moved in exactly zero tenants in the last year as a direct result of the City's illegal actions.

510 Bering Suite 620 Houston, TX

77057

# CHANDLER CAPITAL

City officials, acting primarily through building Inspector John Impellizzeri, have repeatedly imposed unlawful barriers that have blocked new home placements and interfered with cosmetic renovations to existing park-owned homes. While Mr. Impellizzeri has been the most visible agent of these enforcement actions, the City has been fully aware of this conduct, failed to intervene, and in doing so, ratified or encouraged the ongoing pattern of discriminatory and retaliatory enforcement.

These enforcement actions violate local, state, and federal law, and include the following:

## 1) No Legal Authority to Inspect or Enforce:

- a. MCL 125.2307 of the Michigan Mobile Home Commission Act states "a local government may adopt an ordinance to inspect mobile homes. if the mobile home being inspected is being rented to a tenant by the owner of the mobile home." None of the red-tagged homes meet this condition. The City therefore lacked jurisdiction, rendering the red tags invalid and unenforceable.
- b. Cosmetic Repairs: In addition, the work performed—painting, flooring, and sheetrock repair is purely cosmetic and non-structural. Even if the City had jurisdiction over the units in question (which it does not), these activities do not require permits under the City's own municipal code.

## 2) Red Tagging Without Inspection, Notice, or Due Process

- a. Violation of Due Process: In addition to lacking jurisdiction under MCL 125.2307(7), Mr. Impellizzeri has repeatedly violated due process rights under both local ordinance and constitutional law, rendering the red tags legally void and unenforceable
- b. Warren Code 9-157 through 9-160 govern the legal process for condemning or placarding a dwelling as unfit for habitation. These provisions require: Written notice to the owner or occupant with the address, inspection date, inspector's name, and stated grounds for condemnation (S 9-160), a clear statement of the right to a hearing and the procedure to request one (S 9-160), posting of a placard that contains specific statutory language, including "Condemned As Unfit For Human Habitation" (S 9-157), at least 10 days' notice before any vacate order becomes effective (S 9-158). None of these requirements were followed as shown on page five below. The City has previously been notified of Mr. Impellizzeri 's refusal to adhere to the municipal code and due process numerous times in the past.
- c. Stop Work Order: On August 1<sup>st</sup> at Twin Pines Lot 89, Mr. Impellizzeri redtagged the home as an "Unsafe Structure" and issued a "Stop Work Order" without entering the unit, without conducting an interior inspection, and without performing a walk-around exterior review. Witnesses Demetrius Verge, Wendell

# CHANDLER CAPITAL

Curry, and Jennifer Hieber all confirm that Mr. Impellizzeri issued the red tag based solely on a visual observation from the street. No statutory notice was issued, no written report was provided, and no inspection findings were documented—all in direct violation of Warren Code and constitutional due process standards.

## 3) Pattern of Retaliatory and Discriminatory Misconduct by City Officials

- a. Threat to Amy Wilson (2024): When a water leak was discovered at Landmark Estates, Mr. Impellizzeri threatened to revoke the park's operating authority unless repairs were completed that same day. No inspection was performed. The threat was baseless, coercive, and made without legal authority.
- b. Threat to Jason Janda: In a recorded call on July 29, 2025, fellow Warren park owner Jason Janda recounted being threatened by Mr. Impellizzeri with mass enforcement: "You really won 't want me over there crawling through your entire park and flagging every single thing—I'll do it. " This is a clear instance of retaliatory enforcement under color of law.
- c. Public and Internal Bias Statements: In various media articles, Mr. Impellizzeri has publicly referred to the park's infrastructure as "so old" that the City has to manage it, and complained that "it isn 't fair that the City has to become the management company here." On Friday August 1<sup>st</sup> he stated that the older homes are "not salvageable" or "worth saving" and encouraged their removal—even when legally compliant. These statements reveal a discriminatory mindset, not a code-based enforcement posture.
- d. Collectively, this misconduct supports claims under the Fair Housing Act, 42 U.S.C. 1983, and *Monell v. Dept. of Social Services*, 436 U.S. 658 (1978).

## 4) Obstruction Through Non-Response and Constructive Denial

- a. Lack of Response: Mr. Impellizzeri admitted during a July 22nd, 2025 meeting that he was in receipt of a permit application for Lot 55B (1924 Jarvis) at Landmark Estates. This is the exact same lot that had a previously approved permit for home placement under identical conditions in 2023. Despite five separate follow-up emails requesting a decision or status update, no written response, permit decision, or correction list has been provided to date.
- b. No Formal Denial: At no point has the City issued a formal denial or cited any specific deficiencies in the application. This silence despite confirmed receipt — constitutes a constructive denial and a clear violation of procedural due process. The refusal to engage, coupled with the absence of any written findings or legally supported explanation, has obstructed a lawful and routine permitting action and raises serious equal protection concerns.

# CHANDLER CAPITAL

- c. FOIA Request: To further investigate potential disparate treatment and selective enforcement, a Freedom of Information Act (FOIA) request was submitted on Friday, August 1, 2025, requesting records of all manufactured home park permit applications submitted to the City of Warren since 2010, including whether each was approved, denied, or left unresolved.

## 5) Invented Standards and Arbitrary Enforcement

- a. Requirements Without Basis in Law: The City, acting primarily through Mr. Impellizzeri, has imposed non-codified and inconsistent permit barriers with no basis in the Warren Code, Michigan Administrative Code, or HUD regulations, including:
- b. Engineered Site Plans for infill on existing pads, despite no such requirement in city code and prior approvals (e.g., Lot 55B in 2023) without one.
- c. New Concrete Piers demanded for older homes, even though Mich. Admin. Code R 125.1606(6) allows continued use of existing foundations if sound.
- d. Manufacturer "Roadworthiness" Letters for homes from the 1980s—1990s — documents that are impossible to obtain and not legally required.
- e. Permits for Cosmetic Work such as painting, drywall, or skirting—none of which are permit-triggering under Warren Code.
- f. Energy Code Upgrades Upon Vacancy, including demands for double-pane windows and modern insulation, in violation of MCL 125.2307(4) and HUD preemption (24 CFR Part 3285).
- g. 3x3 Landing Requirement: The City has imposed a requirement that all manufactured homes include a minimum 3-foot by 3-foot landing at the top of exterior stairs. This standard appears nowhere in the Warren Code, Michigan Administrative Code, or HUD regulations, and has not been adopted through any formal rulemaking process. Nonetheless, it was explicitly cited by Mr. Impellizzeri as a basis for the red "Stop Work" order issued at Lot 89.
- h. Code Selection by Owner: Mr. Impellizzeri has admitted on a recorded call that there is no consistent enforcement framework governing inspections or permitting for manufactured homes, stating that applicants are "allowed to select what code [they] want to work under" including: "The Michigan Building Code, Michigan Residential Code, Michigan Energy Code, HUD code, and ANSI standards".
- i. No Due Process: By failing to apply a clear, objective, and uniform standard when inspecting or evaluating homes, the City has violated: The Due Process Clause of the

14th Amendment, which prohibits arbitrary and standardless enforcement j \* Excessive Surveillance: City officials, including Mr. Impellizzeri, have been observed conducting frequent, unannounced drive-throughs of Landmark Estates and Twin Pines. These inspections, which often occur multiple times per day, reflect a level of scrutiny not applied to other forms of housing in Warren and constitute evidence of discriminatory enforcement and unlawful surveillance under color of law.

# CHANDLER CAPITAL

- k. MCL 125.2307 explicitly preempts local governments from imposing higher construction, installation, or aesthetic standards on mobile homes without approval from the Michigan Manufactured Housing Commission. The City of Warren has adopted and enforced such standards unilaterally—without filing, review, or authorization—rendering them legally void\*

Photographic evidence of improperly issued notices in Violation of MCL 125 · 2307 (7) , Warren Code § § 9 — 157 to 9 — 160 , and the Fourteenth Amendment's Due Process Clause.

In advance of anticipated litigation, please consider this a formal request that the City of Warren and its departments preserve all documents, communications, and records including internal emails, staff messages (such as texts, Microsoft teams, Slack messages, etc.), meeting notes, permit records, and red-tagging logs relating to Twin Pines, Landmark Estates, and the City's enforcement, permitting, inspection, or zoning activities concerning manufactured housing communities. This preservation request applies to all City staff and officials involved, including the Building, Planning, Zoning, Legal, and Water Departments.

This notice expressly includes a demand that all communications, documents, calendars, and records authored by, received by, or referencing Building Inspector John Impellizzeri be preserved in full, including any stored on personal devices or accounts if used for City business. If any City-issued vehicles or cellular devices are assigned to Mr. Impellizzeri, you are further directed to preserve all associated location data, movement logs, GPS records, or related metadata reflecting his physical presence or travel during work-related activities

Destruction, alteration, or failure to preserve relevant records after receiving this notice will be construed as evidence of willful spoliation and may result in court-imposed sanctions, including adverse inference instructions, monetary penalties, and potential contempt findings. We are monitoring this preservation demand and reserve the right to subpoena all relevant data repositories in any forthcoming litigation.

This includes, but is not limited to, communication referencing the following words:

- a. "Landmark Estates" or "Landmark," or "Twin Pines,"
- b. "Brenton Chandler" or "Chandler Capital"
- c. "Red tag" or "Tagged"
- d. "Warren MH Holdings LLC" or "Warren Homes Holdings LLC"
- e. "Blank" or "Blank Family Communities" or "BFC" f. "Steven Blank" or "David Blank"
- g. "Robert Kerr" or "Amy Wilson"
- h. "Mobile Homes" or "Trailers" or "Manufactured Housing"

# CHANDLER CAPITAL

- i. "Hitched Wholesale" or "Kimberly Korf" or "Kelly Whitfield"
- j. "Site Plan" or "Site Plans"
- k. "Spacing Requirements" or "Setbacks" or "Setback Requirements"
- l. "Grandfathered"
- m. "Piers" or "Pads"
- n. "Lakeshore" or "Lakeshore Legal Aid" or "Legal Aid" 0.  
"R-4 Zoning"
- p. "HUD" or "HUD code"
- q. "Lafayette Place" or "Motor City" or "Continental" or "Shady Lane" or "Shady Lane" or "Warren Estates" or "Bear Creek" or "Glenwood" or "Glenn Wood" or "Eckert's" or "Eckerts" or "Parklane" or "Jackson"

We demand: 1) that the City immediately cease the use of non-codified permitting barriers, 2) red-tagging without cause or due process, 3) all forms of selective enforcement that inhibit legal housing activity, 4) begin processing all pending and future permits in a timely manner, and 5) issue timely and written explanation of any denied permits including citations to specific Warren ordinances or state/federal law.

Finally, we demand that the City take immediate action to implement oversight procedures ensuring consistent, lawful, and non-discriminatory enforcement going forward, beginning with the removal of Mr. Impellizzeri from any role involving oversight, inspection, or permitting at Landmark Estates and Twin Pines, due to his repeated noncompliance with applicable law, refusal to provide lawful justification for enforcement actions, and multiple documented instances of selective, arbitrary, and retaliatory conduct.

If the City fails to take corrective action within ten (10) business days, we intend to file a formal complaint with the U.S. Department of Housing and Urban Development (HUD) alleging systemic violations of the Fair Housing Act (42 U.S.C. 3601 et seq.), including discriminatory intent and/or disparate impact, as well as violations of the Fourteenth Amendment and 42 U.S.C.

§ 1983 arising from the deprivation of property rights without due process. Following submission of the HUD complaint, we intend to pursue all available remedies under federal and state law, including formal litigation and referral to appropriate state regulatory bodies.

Sincerely,



Brenton Chandler



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January 8, 2024

Via Email

Ethan Vinson  
City Attorney  
City of Warren

Re: Cease and Desist — Immediate Action Needed

Dear Mr. Vinson:

As you know, this firm represents LME MHP LLC d/b/a Landmark Estates ("Landmark"), and I write on its behalf to demand that the City require Mr. Impellizzeri to comply with the Warren Code of Ordinances (the "Code") and to request that Mr. Impellizzeri immediately cease and desist any ongoing or future actions that violate the Code. I also write to demand that Mr. Impellizzeri cease and desist from further contacting and harassing residents in the Landmark Estates Mobile Home Park (the "Community") and from continuing to make defamatory statements regarding Landmark and the Community.

Mr. Impellizzeri has repeatedly and flagrantly disregarded the Code by improperly tagging homes in the Community. Over the course of the last two years, Mr. Impellizzeri has tagged dozens of homes in the Community without following the Code. As we have discussed, most of the homes Mr. Impellizzeri has tagged are not owned by Landmark, but rather are owned by individuals who own their homes and rent lots from Landmark on which their homes are located.

As you know, Code Section 9-168 requires a "code official" to "issue a written notice of [a] dangerous building, structure or premise to the owner, occupant or other party of interest." This provision mandates that the notice "include the date of inspection, the name of the inspector, the condition of the building, structure or premises, the repairs necessary to abate the nuisance and the time within which the nuisance shall be abated." Furthermore, "[f]or mobile homes, notice shall

be served personally; or in lieu of personal service, notice may be mailed by certified mail, return receipt requested, addressed to the owner of the mobile home, owner of the mobile home park, occupant, or other party in interest at the address shown on tax records or owner listed on the mobile home title filed with the Secretary of State, if available."

Despite the Code's clear process, Mr. Impellizzeri continues to tag homes in the Community without providing Landmark with the required notice or otherwise following the Code. We have

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## Dykema

John Impellizzeri

January 8, 2024

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included multiple photographs demonstrating that Mr. Impellizzeri has failed to comply with Section 9-168. Pursuant to our December 1, 2023 conversation in which you instructed me to have Landmark remove improperly placed tags on homes, we have done so. Nonetheless, Mr. Impellizzeri's actions create fear and angst among residents who believe the City is going to take away their homes and force them into homelessness.

Upon information and belief, Mr. Impellizzeri also continues to harass Community residents by knocking on their doors and threatening them with false allegations and misinformation. Additionally, upon information and belief, Mr. Impellizzeri recently terrified Community residents over the holidays by falsely claiming that they were breathing unidentified harmful gasses by living in the Community. Mr. Impellizzeri's apparent actions and defamatory remarks regarding the Community as an agent of the City have irreparably harmed Landmark's business and have hampered its efforts to provide affordable housing to City residents.

Landmark demands that Mr. Impellizzeri immediately cease and desist from tagging homes without following the Code and from making any defamatory statements, and that the City provide written assurances within five (5) business days of your receipt of this letter that you have taken appropriate steps to ensure that Mr. Impellizzeri complies with the Code and applicable defamation laws.

In the event the City fails to comply within five (5) business days of your receipt of this letter, we will advise Landmark to take immediate legal action, including seeking damages, injunctive relief, and attorneys' fees and costs. We trust you will take these allegations seriously and comply with Landmark's demands.

This letter is not a complete statement of Landmark's rights in connection with this matter and nothing in this letter constitutes a waiver, estoppel, admission, or prejudice of any kind to Landmark's rights and defenses under the law or otherwise. To be clear, Landmark reserves all rights.

Your immediate attention to this matter is required.

Sincerely,

Dykema Gossett PLLC

A handwritten signature in black ink, appearing to read "Jason T. Hanselman". The signature is written in a cursive style with a horizontal line extending from the end.

Jason T. Hanselman

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City of Warr  
29500 Van Dyke Ave.  
Phone: 574-4504

**INSPECTION NOT APPROVE**

Please make corrections and recall for inspection within ten (10) days.

Address LANDMARK

Permit # \_\_\_\_\_ Date 12/22/20

~~DO NOT~~  
~~REMOVE~~  
~~UNSAFE~~  
~~STRUCTURE~~

Inspector JOHN E.

# UNSAFE STRUCTURE

THIS BUILDING MAY BE  
ORDERED DEMOLISHED BY  
THE CITY OF WARREN

Ordinance 80 625, Chapter 9, Article 2, Section 9-165

DATE: 12.12.23	DIVISION OF BUILDING & SAFETY ENGINEERING 1 City Square, Suite #305 PHONE: 574-4504 WARREN, MICHIGAN
INSPECTOR:	
JOHN I	

BY



# UNSAFE STRUCTURE

THIS BUILDING MAY BE  
ORDERED DEMOLISHED BY  
THE CITY OF WARREN

Ordinance 80 625, Chapter 9, Article 2, Section 9-165

DATE: 11.28.23	DIVISION OF BUILDING & SAFETY ENGINEERING 1 City Square, Suite #305 PHONE: 574-4504 WARREN, MICHIGAN
INSPECTOR:	
JOHN I.	

UNSAFE  
STRUCTURE  
THIS BUILDING MAY  
BE  
ORDERED  
DEMOLISHED BY  
THE CITY OF WARREN

Ordinance 80625, Chapter 9, Article VI, Division 2, Section 9-165

PATE

DIVISION OF BUILDINGS

&

SAFETY ENGINEER

1 City Square, Suite #305

INSPECTOR

574-4504 WARREN MICHIGAN

# UNSAFE STRUCTURE

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Jason T. Hanselman

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Direct Fax: (855) 259-3569

Email:

JHanselman@dykema.com

August 30, 2024

Via Email

Mary Michaels  
Interim City Attorney  
City of Warren

**Re: Cease and Desist — Immediate Action Needed**

Dear Ms. Michaels:

This firm represents Motor City Mobile Home Park (the "Community"), and I write on its behalf to demand that the City require Mr. Impellizzeri to comply with the Warren Code of Ordinances (the "Code") and to request that Mr. Impellizzeri immediately cease and desist any ongoing or future actions that violate the Code. I also write to demand that Mr. Impellizzeri cease and desist from further harassment of the Community's employees and from continuing to improperly red tagging homes within the Community.

Mr. Impellizzeri has repeatedly and flagrantly disregarded the Code by improperly red tagging homes in the Community. Over the course of the last two years, Mr. Impellizzeri has tagged dozens of homes in the Community without complying with

the Code. Most of the homes Mr. Impellizzeri has tagged are not owned by the Community, but rather are owned by individuals who own their homes and rent lots from the Community on which their homes are located.

As you know, Code Section 9-168 requires a "code official" to "issue a written notice of [a] dangerous building, structure or premise to the owner, occupant or other party of interest." This provision provides that the notice "include the date of inspection, the name of the inspector, the condition of the building, structure or premises, the repairs necessary to abate the nuisance and the time within which the nuisance shall be abated." Furthermore, "[for mobile homes, notice shall be served personally; or in lieu of personal service, notice may be mailed by certified mail, return receipt requested, addressed to the owner of the mobile home, owner of the mobile home park, occupant, or other party in interest at the address shown on tax records or owner listed on the mobile home title filed with the Secretary of State, if available."

Despite the Code's clear process, Mr. Impellizzeri has repeatedly exceeded the scope of his statutory authority by red tagging homes in the Community without providing the required notice or otherwise following the Code. We have included multiple photographs demonstrating that Mr. Impellizzeri has failed to comply with Section 9-168. Mr. Impellizzeri's unlawful actions create

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Mary Michaels

August 30, 2024

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fear and angst among the Community's residents who believe the City is going to take away their homes and force them into homelessness.

Additionally, upon information and belief, Mr. Impellizzeri has harassed Community employees and instructed them that the Community must remove certain homes. The Community has attempted to work cooperatively with Mr. Impellizzeri to reach

an agreement about which homes would be torn down, but this agreement did not stop the unlawful red tagging and harassment. Mr. Impellizzeri's apparent actions as an agent of the City have irreparably harmed the Community's business and have hampered its efforts to provide affordable housing to City residents.

The Community demands that Mr. Impellizzeri immediately cease and desist from tagging homes within the Community without following the Code and from harassing Community employees, and that the City provide written assurances within five (5) business days of your receipt of this letter that you have taken appropriate steps to ensure that Mr. Impellizzeri complies with the Code and stops harassing Community employees. If you disagree with our belief that Mr. Impellizzeri has acted unlawfully, we request a meeting by September 4, 2024, to discuss a resolution of this issue.

In the event that the City fails to comply within five (5) business days of your receipt of this letter, we will advise the Community to take immediate legal action, including seeking damages, injunctive relief, and attorneys' fees and costs. We trust you will take these allegations seriously and comply with the Community's demands.

This letter is not a complete statement of the Community's rights in connection with this matter and nothing in this letter constitutes a waiver, estoppel, admission, or prejudice of any kind to the Community's rights and defenses under the law or otherwise. To be clear, the Community reserves all rights.

Your immediate attention to this matter is required.

Sincerely,

Dykema Gossett PLLC

A handwritten signature in cursive script that reads "Jason T. Hanselman". The signature is written in dark ink and is positioned above the printed name.

Jason T. Hanselman

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