

William Joyce, Jacqueline Vece, et al. : Fair Rent Commission
v. : Town of Killingworth
Sun Communities, Inc. : May 13, 2026

MEMORANDUM OF DECISION

Beechwood is a manufactured home community in Killingworth, Connecticut (“Beechwood”) containing 297 manufactured home parcels and limited to residents who are 55 years or older. Beechwood is owned and operated by the respondent Sun Communities, Inc. (“Sun”). The residents of Beechwood own their own manufactured homes and hold responsibility for the normal expenses associated with home ownership such as taxes, insurance, utilities and the like. Sun owns the land upon which each manufactured home sits and charges rent to Beechwood residents for the placement of their manufactured homes on Beechwood parcels and for the provision of certain other services. Presently, each Beechwood resident pays \$571.00 per month to Sun for land rent. Sun sent notices to Beechwood residents earlier this year alerting them to an increased rent of \$27.00 per month - for a new total of \$598.00 per month - from May 2026 to May 2027. After receiving these notices, the renters of 186 of Beechwood’s 297 parcels filed complaints with the

Killingworth Fair Rent Commission (“Commission”). (A list containing each complainant’s name and address is attached as **Exhibit A.**) By agreement of the parties, the complaints were consolidated for one hearing. By further agreement of the parties and, due to the similarity of the complaints, class representatives were allowed to speak on behalf of all the complainants and were subject to the respondent’s cross-examination and questions from the Commission.

I. Commission Authority And Standard Of Review

The Killingworth Fair Rent Commission exists pursuant to Chapter 15, Art. 5, §15-14, et seq. of the Code of the Town of Killingworth (“Code”). The Code grants the Commission the powers and authority set forth within Conn. Gen. Stat. §§7-148b to 7-148f.

Pursuant to Conn. Gen. Stat. §7-148c, the Commission is tasked with “determining whether a...proposed rental is so excessive, with due regard to all the circumstances, as to be harsh and unconscionable.” In making this determination, the Commission shall consider such of the following thirteen circumstances as are applicable to the type of accommodation:

1. the rents charged for the same number of rooms in other housing accommodations in the same and in other areas of the municipality;
2. the sanitary conditions existing in the housing accommodations in question;

3. the number of bathtubs or showers, flush water closets, kitchen sinks and lavatory basins available to the occupants thereof;
4. services, furniture, furnishings and equipment supplied therein;
5. the size and number of bedrooms contained therein;
6. repairs necessary to make such accommodations reasonably livable for the occupants accommodated therein;
7. the amount of taxes and overhead expenses, including debt service, thereof;
8. whether the accommodations are in compliance with the ordinances of the municipality and the general statutes relating to health and safety;
9. the income of the petitioner and the availability of accommodations;
10. the availability of utilities;
11. damages done to the premises by the tenant, caused by other than ordinary wear and tear;
12. the amount and frequency of increases in rental charges;
13. whether, and the extent to which, the income from an increase in rental charges has been or will be reinvested in improvements to the accommodations.

II. Factual And Legal Analysis

The Commission held a recorded four hour hearing on May 2, 2026 at the Haddam-Killingworth Intermediate School auditorium. For the reasons that follow,

the Commission decided to forbid any rent increase for the complainants for the period of May 2026 to May 2027.

Many of the Conn. Gen. Stat. §7-148c factors are inapplicable to the consideration of whether a proposed rental increase for land rent in a manufactured home community is harsh and unconscionable. The evidence and testimony presented by the parties tended to focus on comparable rents at other regional manufactured home communities, maintenance activities conducted by Sun at Beechwood, Sun's expenses at Beechwood, income of the complainants, the availability of alternate accommodations, the amount and frequency of rental increases and whether, and the extent to which, the income from an increase in rental charges has been or will be reinvested in improvements to the accommodations.

The cases construing Conn. Gen. Stat. §§7-148c do not support the premise that a fair rent commission must consider every one of the thirteen statutory factors or state why a factor or factors do not apply. A fair rent commission has rather to possess an accurate picture of the situation when it gives its ruling. *See Grateful Holdings, LLC v. Manchester Housing and Fair Rent Commission*, Judicial District of

New Britain, Docket No. HHB-CV-24-6088028 (May 6, 2025, Cohn, J.) 2025 WL 1378954 (2025).

The Commission received evidence that the Beechwood land rent in 2019 was 433.00 and, thereafter, was increased as follows:

- by 13.00 per month in 2020 (to \$446.00);
- by \$12.00 per month in 2021 (to \$458.00);
- by \$23.00 per month in 2022 (to \$481.00);
- by \$35.00 per month in 2023 (to \$516.00);
- by \$28.00 per month in 2024 (to \$544.00); and
- by \$27.00 per month in 2025 (to \$571.00).

The proposed rent increase for 2026 is an additional \$27.00 per month which would bring the total monthly land rent to \$598.00.

Meanwhile, Sun produced evidence that it realized the following net profits from its operations at Beechwood:

- \$965,257.00 in 2021;
- \$993,098.00 in 2022;
- \$941,845.00 in 2023;
- \$975,310.00 in 2024; and

- \$1,070,143.00 in 2025.

At the hearing, Sun represented that their net profit figures should be reduced by general and administrative expenses and by debt service. Sun provided no specific numbers as to what these expenses were at Beechwood or as to how they should apply to Sun's provided net profit information at Beechwood. Sun also produced evidence of capital expenditures of:

- \$110,225.00 in 2020;
- \$631,691.00 in 2021;
- \$490,454.00 in 2022;
- \$634,185.00 in 2023;
- \$89,385 in 2024; and
- \$242,666.00 in 2025.

The complainants produced evidence of a prior meeting with Sun Division Vice President Brandon George in which Mr. George responded to tenant complaints about rising rent costs for tenants on fixed incomes by stating that the tenants should consider applying for state and federal assistance as a remedy. Mr. George appeared as a witness at the May 2, 2026 hearing and did not dispute this testimony.

The complainants produced testimony and evidence that Sun's maintenance work at Beechwood was insufficient and that resident calls for assistance were often ignored or unfulfilled. Sun produced testimony and evidence that it provided sufficient maintenance services and that many tenant maintenance complaints related to issues that were not the responsibility of Sun.

As to comparable rents, Sun produced evidence of rents at twelve regional manufactured home communities, with seven comparable rents appearing as higher than the proposed increased rent at Beechwood and five of the comparable rents being lower than the proposed increased rent at Beechwood. Of note, one comparable rent – at Colchester Commons in Colchester, Connecticut – was dramatically lower than any other provided comparable rental amount. Upon inquiry by the Commission, Sun representatives stated that the Colchester Commons rent was so much lower because that community was "resident owned" and there was no concern for earning profits as there was at Sun's Beechwood property and the other comparable manufactured home communities.

Evidence of complainant income was sporadic and mostly anecdotal.

The complainants introduced unchallenged testimony that seeking other accommodations is more challenging with a manufactured home since moving one's residence also would include moving one's manufactured home.

Finally, as to the issue of reinvestment of the increased rental charge into improvements to the accommodations, the total increased revenue from the 186 complainants (at \$27 per month) would amount to an additional one year total of \$60,264.00 in gross revenue for Sun at Beechwood. Sun representatives indicated that some planned maintenance projects would likely proceed even without the rental increase, but some would not. In view of Sun's evidence that it realized a \$1,070,143.00 profit in 2025 at Beechwood, it is apparent that the rent increase is not necessary to reinvest in improvements at Beechwood. This remains true even if one adjusts Sun's evidence of its profits downward by taking into account some level of debt service payments and general and administrative expense overhead - despite the lack of evidence presented to support these expenses - and by factoring in Sun's evidence of capital expenditures from 2020 to 2025. Taking all of this evidence and these factors into consideration, the proposed rent increase is untethered to reinvestment in improvements in the accommodations.

III. Conclusion And Order

The caselaw construing the applicable statutes demonstrates that a fair rent commission has legal authority to determine both the amount of rent and the time period of the Commission's order. *See Grateful Holdings.*

As a result of its consideration of the testimony, evidence and issues presented at the May 2, 2026 hearing and in compliance with the governing statutory factors, the Commission, by a vote of 4 in favor and 1 opposed, orders that no rental increase is to be permitted for the period May 2026 to May 2027 for the 186 complainants in this case.

David J. Cutillo, Chairman	Nay
Leo T. Bombalicki, Jr.	Aye
John Thomas Byrne, Secretary	Aye
Ellen L. Oppenheimer	Aye
Robert T. Rimmer	Aye

SO ORDERED.

KILLINGWORTH FAIR RENT COMMISSION

EXHIBIT A - COMPLAINANTS

1.	JoAnn Janicki	1 Beechwood Road
2.	Denise C. Volo	4 Beechwood Road
3.	Sandra Santos	5 Beechwood Road
4.	John & Nancy Bagnoli	7 Beechwood Road
5.	Suzanne E Ziobron	9 Beechwood Road
6.	Lora Hanley	10 Beechwood Road
7.	Dave & Barbara Wyzykowski	11 Beechwood Road
8.	Lynn Marcotte	14 Beechwood Road
9.	Corine Lavoie	17 Beechwood Road
10.	John & Lynn Hozjan	18 Beechwood Road
11.	Diane & Ken Minervini	19 Beechwood Road
12.	Larry Marzano	20 Beechwood Road
13.	Sheryl Jacobs	1 Boulder Trail.
14.	Donna O'Connell	2 Boulder Trail
15.	Holly & Leonard Hesse	3 (Upper) Boulder Trail
16.	Ronald Laporto	4 Upper Boulder Trail
17.	Diane & Bill Cote	5 Boulder Trail
18.	Susan & Stanley Fenrow	7 Upper Boulder Trail
19.	Jennifer & Mark Zakrewski	8 Boulder Trail
20.	Dawn Fritzell & Robert Marinko	9 Boulder Trail
21.	Patricia Carr	27 Boulder Trail
22.	Marlene E. Rusconi	29 Lower Boulder Trail
23.	Donald Doucette, Jr.	10 Boulder Trail
24.	Deborah A. Arnold	12 Upper Boulder Trail
25.	Richard Salmoiraghi	13 Lower Boulder Trail
26.	Robert & Patricia Radawich	16 Boulder Trail
27.	Lynda J. Burgess	18 Boulder Trail
28.	Barbra Shapiro	19 Boulder Trail
29.	Gail Laviana	21 Boulder Trail
30.	Janet Berry	22 Boulder Trail

31.	Philip & Carol Monty	23 Boulder Trail
32.	Elizabeth Harris	25 Lower Boulder Trail
33.	Michael Crabb	28 Boulder Trail
34.	Joseph Minervini	30 Boulder Trail
35.	Polly Schumann	31 Boulder Trail
36.	Lisa Barbour	32 Boulder Trail
37.	James W. Carr	33 Boulder Trail
38.	Leroy Stanford	34 Lower Boulder Trail
39.	Theresa Aresco	35 Lower Boulder Trail
40.	Betty Albrecht	37 Boulder Trail
41.	Antoinette Hayden	38 Lower Boulder Trail
42.	Barbara Ciociola	39 Lower Boulder Trail
43.	Susan Origlia	40 Boulder Trail
44.	Cynthia Sheroki	41 Boulder Trail
45.	Grace Greco	42 Lower Boulder Trail
46.	Larry Darling	43 Lower Boulder Trail
47.	Stephanie LeMay	44 Boulder Trail
48.	Carol Hokanson	45 Lower Boulder Trail
49.	David Munson	1 Bridle Path Trail
50.	Donald & Joanne Currier	5 Bridle Path Trail
51.	Elizabeth & Kenneth Stopa	7 Bridle Path Trail
52.	Susan Arms	9 Bridle Path Trail
53.	Thomas & Margaret Tyson	11 Bridle Path Trail
54.	Thomas Lund	15 Bridle Path Trail
55.	Joanne Loomis / Mark White	17 Bridle Path Trail
56.	Judeann Palermo	18 Bridle Path Trail
57.	Ralph Milum	23 Bridle Path Trail
58.	Mary R. Haburay	25 Bridle Path Trail
59.	Terry Zaccarelli	31 Bridle Path Trail
60.	Carol & Albert Martone	33 Bridle Path Trail
61.	Annette Laroche Talmadge	38 Bridle Path Trail
62.	Lorraine Maru	39 Bridle Path Trail
63.	Veronica Trettewick	40 Bridle Path Trail
64.	Gregory Hoye	43 Bridle Path Trail
65.	Janet Dumont	45 Bridle Path Trail
66.	Kim Justin	47 Bridle Path Trail

67.	Maureen Schactzl	48 Bridle Path Trail
68.	Janet Whittredge	41 Bridle Path Trail
69.	Joseph W. Chomicz, Jr.	3 Country Club Trail
70.	John J. Buckler	5 Country Club Trail
71.	Michael & Rhoda Anderson	10 Country Club Trail
72.	Jeanne M. Chimino	14 Country Club Trail
73.	Sheila Ahearn	15 Country Club Trail
74.	John & Pamela Early	17 Country Club Trail
75.	Donald & Sally Chittenden	18 Country Club Trail
76.	Michael & Georgine Trosuk	19 Country Club Trail
77.	Derry Zacarelli	21 Country Club Trail
78.	Charlotte Esposito	5 Hilldale Trail
79.	Sandra A. Bellmore	11 Hilldale Trail
80.	Nancy Johnson	2 Livemore Trail
81.	Louanne Hopkins	3 Livemore Trail
82.	Karen E. Burgess	4 Livemore Trail
83.	Ellen Caprio	5 Livemore Trail
84.	Deborah Floyd	6 Livemore Trail
85.	Carl & Beverly Englehart	9 Livemore Trail
86.	Irene DesJardins	11 Livemore Trail
87.	Maureen Walston	12 Livemore Trail
88.	Shirley Hawkes	14 Livemore Trail
89.	Raymond & Theresa Ledger	15 Livemore Trail
90.	Carrie Floyd	16 Livemore Trail
91.	JoAnn Bennett	17 Livemore Trail
92.	Carolyn Janus	18 Livemore Trail
93.	Susan B. Johnson	20 Livemore Trail
94.	Phil & Marilyn White	21 Livemore Trail
95.	Christine Reed	8 Pleasant Trail
96.	Kathleen Amoia	9 Pleasant Trail
97.	Douglas Paul	10 Pleasant Trail
98.	Joan Ouellette	12 Pleasant Trail
99.	Laura & Tom Tupper	15 Pleasant Trail
100.	Lynn Bauer	16 Pleasant Trail
101.	David & Margo DeFelice	17 Pleasant Trail
102.	John Borelli	19 Pleasant Trail

103.	Earl Wininger	2 Stonewall Drive
104.	Helene Denny	3 Stonewall Drive
105.	Karen & Dave Ross	5 Stonewall Drive
106.	Angela & Gary Ciempa	8 Stonewall Drive
107.	Vincent & Angela Trunzo	11 Stonewall Drive
108.	Howard & Muriel Hurowitz	16 Stonewall Drive
109.	Barbara & Art O'Neil	17 Stonewall Drive
110.	Kathleen Harrington	18 Stonewall Drive
111.	Debra Haburay	2 Swan Lake Trail
112.	Cliff & Carol Goodale	6 Swan Lake Trail
113.	Bernice Montgomery	10 Swan Lake Trail
114.	Catherine Wicykowski	14 Swan Lake Trail
115.	Loretta Milhomme	22 Swan Lake Trail
116.	Andrea J. VanJeune	24 Swan Lake Trail
117.	Virginia Niedza	26 Swan Lake Trail
118.	William Joyce	28 Swan Lake Trail
119.	Donald & Susan Graichen	30 Swan Lake Trail
120.	Joyce Warren	34 Swan Lake Trail
121.	Maurice & Valerie Corley	36 Swan Lake Trail
122.	Susan Lepack	38 Swan Lake Trail
123.	Thomas Micco	40 Swan Lake Trail
124.	Ethel Thomsen	2 Whitewood Road
125.	Dianne B. Provost	3 Whitewood Road
126.	Christine Etlinger	4 Whitewood Road
127.	Thomas Millspaugh	5 Whitewood Road
128.	Debra Dunbar	6 Whitewood Roa
129.	David Sterpka	7 Whitewood Road
130.	Bonnie Wilmot	12 Whitewood Road
131.	Angelina Blanchard	16 Whitewood Road
132.	Marylee Pirani	9 Whitewood Road
133.	Sandra Kiefer	11 Whitewood Road
134.	Patricia A. Aronson	14 Whitewood Road
135.	Mary Neagle	18 Whitewood Road
136.	Mary A. Karabeineikoff	21 Whitewood Road
137.	Julianne Cataldo	22 Whitewood Road
138.	Stephen Woods	23 Whitewood Road

139.	Deborah Frasco	26 Whitewood Road
140.	Harry & Elizabeth Pinor	28 Whitewood Road
141.	Lori Greco	31 Whitewood Road
142.	Grace Kopycinski	34 Whitewood Road
143.	Stephen Tavernier	35 Whitewood Road
144.	Timothy J. O'Connell	36 Whitewood Road
145.	Loretta Quattrini	37 Whitewood Road
146.	Mary Ellen Lorenz	41 Whitewood Road
147.	Carol Sturges	42 Whitewood Road
148.	Sheila Kimball	43 Whitewood Road
149.	Alan Davies	44 Whitewood Road
150.	Jill Roy	45 Whitewood Road
151.	Toni Stanley	46 Whitewood Road
152.	Gary Miller / Lucille Cramer	3 Woodland Trail
153.	Frances Bayer	2 Woodland Trail
154.	Jacqueline Vece	5 Woodland Trail
155.	Darlene Evans / Richard Bureau	6 Woodland Trail
156.	Deborah & Joseph Testa	7 Woodland Trail
157.	Stephanie D. Izzo	8 Woodland Trail
158.	Shirley Roper	9 Woodland Trail
159.	Ralph & Diane Esposito	10 Woodland Trail
160.	Donna Calabrese	11 Woodland Trail
161.	Virginia Aldrich	15 Woodland Trail
162.	John Lauterbach	17 Woodland Trail
163.	Helene R. Vasmatics	18 Woodland Trail
164.	Mr. and Mrs. Darren Hicks	19 Woodland Trail
165.	Kimberly Erickson	20 Woodland Trail
166.	Janine Schreier	23 Woodland Trail
167.	James Ramonetti	25 Woodland Trail
168.	Frank & Karen Russo	26 Woodland Trail
169.	Barbara Sveilis	29 Woodland Trail
170.	Carol & Richard Boyd	30 Woodland Trail
171.	Theresa Jane Allgaier	32 Woodland Trail
172.	Ann Bednarek	33 Woodland Trail
173.	Gary Dianne & Lynn Bahre	34 Woodland Trail
174.	Richard J. Charley, Jr.	35 Woodland Trail

175.	Rosemary Valentine	38 Woodland Trail
176.	Eileen Cavanaugh	42 Woodland Trail
177.	James Eden	44 Woodland Trail
178.	Christopher Bianchi	44 Swan Lake Trail
179.	Louis S. Vollono, Jr. & Patricia Vollono	10 Livemore Trail
180.	Charlene Spencer	16 Woodland Trail
181.	Joseph & Estelle Vanacore	40 Whitewood Road
182.	James J. Buther	32 Swan Lake Trail
183.	Lucy Kinnane	25 Whitewood Road
184.	Bernice M. Lindhart	19 Bridle Path Trail
185.	Marie Taragowski	16 Country Club Trail
186.	Fudit Kovacs	38 Whitewood Road