



**Department of Business Regulation  
Office of the Director**

1511 Pontiac Avenue, Cranston, RI 02920  
P: 401.462.9552 • F: 401.462.9532  
TTY: 711 • [www.DBR.RI.gov](http://www.DBR.RI.gov)



March 31, 2026

The Honorable Stephen M. Casey  
Chairperson, House Committee on Municipal Government and Housing  
State House  
Providence, Rhode Island 02903

RE: H 8013 – AN ACT RELATING TO MOTOR AND OTHER VEHICLES – MOBILE  
AND MANUFACTURED HOMES

Dear Chair Casey:

I am writing on behalf of the Department of Business Regulation (“DBR”) to assist the Committee with consideration of H8013. This bill would insert the Department into complex real estate transactions between private parties. Managing private real estate transactions is outside an administrative agency’s purview and DBR also lacks the skill set that is necessary to do so.

In mobile home park right of first refusal, purchase and sale, and other contractual transactions, both the park owner (seller) and residents/homeowner’s association (right of first refusal holder/potential buyer) need independent, expert legal counsel to advise, represent and protect their legal and financial interests. Any disputes that arise require resolution through the courts, not an administrative agency, to ensure due process, rights to a jury trial, and any need for equitable and injunctive relief. Such private rights of action could be assigned to the Superior Court’s Land Use Calendar, which has the expertise and was designed to ensure prompt redress for land use matters.

We would be happy to meet with the Committee and/or sponsors to discuss these concerns. Please do not hesitate to contact me at [Elizabeth.dwyer@dbr.ri.gov](mailto:Elizabeth.dwyer@dbr.ri.gov) or 401.462.9615 (office) or 401.578.6653 (mobile) with any questions or for additional information.

Thank you for your consideration of our position on this proposed legislation.

Sincerely,

Elizabeth Kelleher Dwyer, Esq.  
Director, Department of Business Regulation

cc: Honorable Members of the House Committee on Corporations  
The Honorable Lauren H. Carson  
Nicole McCarty, Esq., Chief Legal Counsel to the Speaker of the House