



MEMORANDUM

DATE: February 11, 2026
FROM: Isaac Rosen, City Attorney

University Mobile Home Park (“Park”) was purchased by the University Park Manufactured Housing Community, LLC, and is being overseen by the management company Harmony Communities, Inc. (“Harmony”). Following City Council open session direction on December 16, 2025, that City staff prepare an urgency ordinance with respect to the existing senior-status of the Park, Harmony made several threats of litigation against the City orally. Specifically, Harmony asserted that if the Goleta City Council approve the directed urgency ordinance, Harmony would file a lawsuit against the City. Oral threats of litigation were made by a Harmony representative to the City Manager on Thursday, January 15, 2026, and made to me, in my role as City Attorney, on Monday, February 2, 2026 by Harmony’s legal counsel, Paul Beard. Additionally, the City understands Harmony has informed Park occupants in writing that Harmony has had to prepare for potential litigation against the City. In all instances, the threat of litigation is memorialized within this memorandum to file, which is being made available for public inspection.