



Notice of Administrative Penalty and Reasons for Decision

File # [REDACTED]
January 09, 2026

Carolyn Goldstone
[REDACTED]

To: Carolyn Goldstone

Full Summary of Administrative Penalty

Name of Respondent: Carolyn Goldstone (Respondent)

Regarding rental sites located at: [REDACTED] Manufactured Home Park (MHP) (Rental Property)

Administrative Penalty: \$55,000.00

Date of Penalty Issued: January 09, 2026

Contraventions under the *Manufactured Home Park Tenancy Act (the Act)*: Contravention of section 26(1) (failure to provide and maintain facilities or services related to electricity) and section 27(1) (failure to complete emergency repairs to the electrical systems).

- 1) Between April 29, 2021, to December 9, 2025, Carolyn Goldstone (the "Respondent") failed to provide and maintain the manufactured home park in a reasonable state of repair, and not complying with housing, health and safety standards required by law contrary to section 26(1) of the Act in relation to eleven (11) sites at the MHP.
- 2) Between April 29, 2021, to December 09, 2025, the Respondent failed to complete emergency repairs that are urgent, necessary for the health or safety of anyone or for the preservation or use of property in a manufactured home park regarding electrical systems contrary to section 27(1) of the Act in relation to eleven (11) sites at the MHP.

Outcome of the Investigation:

The Compliance and Enforcement Unit (CEU) received a complaint from an official at Technical Safety British Columbia (TSBC) on September 17, 2025, alleging that the Respondent has failed to address electrical safety hazards initially identified on April 29, 2021, which poses a significant risk to both the residents and property.

Pursuant to section 80.1 of the Act, an investigation commenced on September 18, 2025, into the above allegations and CEU Senior Compliance and Enforcement Investigator A.H. (the Investigator) was assigned to the case.

The Respondent in this matter was identified as Carolyn Goldstone.

At the conclusion of the Investigation the Respondent was provided with an Opportunity to be Heard (OTBH) in accordance with section 80.3(2) of the Act in relation to recommendations for eleven (11) one-time administrative monetary penalties for contravening section 26(1) and section 27(1) of the Act. Administrative monetary penalties are issued to promote compliance only after all other attempts to gain compliance have failed. The Respondent's compliance history and the seriousness of the contravention were considered when determining administrative monetary penalties.

Under the authority provided by Part 6.1 of the Act, the Director of the Compliance and Enforcement Unit ordered eleven (11) one-time administrative monetary penalties in the amount of \$5,000.00 each, for a total administrative monetary penalty of \$55,000.00 against Carolyn Goldstone. These penalties were issued for the deliberate and continuous contravention of section 26(1) of the Act for failing to provide and maintain the manufactured home park in a reasonable state of repair, and failing to comply with housing, health and safety standards required by law, and section 27(1) of the Act for failing to complete emergency repairs to the electrical system between April 29, 2021, to December 09, 2025, at the Rental Property.

The administrative penalty is due on **March 10, 2026**.

Notice of Administrative Penalty

This notice to you, Carolyn Goldstone, is that based on my analysis of the evidence, I hereby order that you are subject to eleven (11) one-time administrative monetary penalties (AMPs) in the amount of \$5,000.00 each for a total AMP of \$55,000.00. I make this order pursuant to section 80.3(1)(a) of the Act, due to your deliberate and continuous contravention of section 26(1) and section 27(1) of the Act between April 29, 2021, and December 09, 2025.

Contravention or failure to which the penalty relates

In accordance with section 80.3(1) of the Act, subject to the regulations, the director may order a person to pay an administrative monetary penalty if the director is satisfied on a balance of probabilities that the person has, contravened a provision of this Act or the regulations, failed to comply with a decision or order of the director, or a demand issued by the director for production of records, or given false or misleading information in a dispute resolution proceeding or an investigation.

On October 08, 2025, based on the evidence before me, the Respondent was provided with a formal Notice of Investigation, served in accordance with the Act, that included information regarding the allegations, the applicable sections of the Act, and information about potential consequences for deliberate contraventions of the Act.

On December 09, 2025, I was provided with an Investigation Report (the Investigation Report) which included all evidence gathered (supporting materials) in the investigation and a recommendation by the Investigator for eleven (11) one-time administrative monetary penalties (AMPs) against the Respondent in the amount of \$5,000.00, each for a total AMP of \$55,000.00 for the deliberate and continuous contraventions of section 26(1) and section 27(1) of the Act.

Opportunity to be Heard (OTBH):

Upon receiving the Investigation report and supporting materials on December 11, 2025, I provided the Respondent with a Notice of OTBH in accordance with section 80.3(2)(a) of the Act and section 54 of *Manufactured Home Park Tenancy Regulation* (the Regulation), before I drew any conclusions or made any final decisions.

I am satisfied that the Respondent was served with the OTBH and all supporting materials before me, in accordance with the applicable sections of the Act and the Regulation. The OTBH included all materials before me including the Investigation Report, Administrative Penalty Assessments, and all evidence gathered during the investigation.

On December 15, 2025, the Respondent submitted an email in response to the December 11, 2025, Notice of OTBH. In this submission the Respondent does not contest the allegations against her and acknowledges the state of deterioration of the Rental Property. The Respondent suggests that the issuing of such a large AMP would place the property in jeopardy which could impact tenancies. The Respondent requests that I not issue the penalty as recommended. I will address the submissions from the Respondent in greater detail in my reasons for decision below.

Background:

Based on evidence in the Investigation Report and Supporting Materials (which has not been contested), the entire property, identified as Crown Villa, located at [REDACTED] is owned by the Respondent. The BC Assessment Authority cites the property's classification as manufactured home park and includes an assessment for the park and the Respondent's home. Additional assessments for the 11 manufactured homes numbered one through 12 (with the exclusion of site 11 as it is vacant) were also included in the supporting material.

According to statements the Respondent provided to the Investigator, she purchased the Rental Property from her father's estate in 1988 and has operated the manufactured home park for the past 37 years. The current value of the property is assessed at \$730,000.00. The Respondent confirmed that there are 11 additional manufactured homes on the Rental Property, each individually owned by their respective occupants and they pay rent to her for each site, although one tenant has purportedly not paid rent for two years.

On April 27, 2021, Technical Safety British Columbia (TSBC) received a complaint regarding electrical concerns at the Rental Property. On April 29, 2021, the first of several subsequent inspections occurred at the Rental Property under the authority of the *Safety Authority Act*. Based on evidence in the Investigation Report, "TSBC regulates high-risk technical safety systems and equipment across the province of BC with some limited authority delegated to 10 municipalities. TSBC oversees several energy technologies including electrical. This includes issuing permits and certifications, conducting both on-site and remote assessments – including incident investigations – and enforcing applicable safety standards to ensure public safety and compliance".

The April 29, 2021, Inspection was conducted by TSBC Safety Officer M.H. (TSBC SO) which resulted in "numerous violations of the BC Electrical Code to be resolved by May 31, 2021. The inspection outcome

was recorded as “Failed”. As a result of the non-compliance with the TSBC violation citations, on March 25, 2022, TSBC Investigator T.S. (TSBC Investigator), issued a Compliance Order directing the Respondent to “obtain the services of a licensed electrical contractor and an electrical installation permit. The order further required the Respondent to correct the incidences of non-compliance identified in the Electrical Certificate of Inspection within 60 days of receipt of the order”.

As a result of what appeared to be non-compliance with the TSBC Orders issued in 2022, starting in April 2025, the TSBC SO and TSBC Investigator began escalating enforcement actions where the objective was to have the Respondent make the necessary repairs at the Rental Property concerning the electrical systems.

Statements provided to the Investigator from the TSBC SO indicated that the Respondent had not completed any of the required repairs despite several warnings and orders.

I note the following electrical issues identified by the TSBC SO which was provided to the Respondent as a result of the April 28, 2025, Inspection:

Item	Comments	Result
Service	<p>Existing 400 amp 120/240 volt overhead service on a treated wood pole on the property.</p> <p>3 - 100 amp meter bases located in the 200 amp sub service enclosure powering a house and 2 mobile homes on the property.</p> <p>11 - 100 amp meter bases located in the 200 amp sub service enclosure powering 10 mobile homes and a water pump.</p>	Non-compliant
Main distribution	400 amp 240 volt dry type Sylvania fused disconnect switch located in a deteriorated plywood non-weatherproof, non-lockable enclosure.	Non-compliant

Sub distribution	<p>400 amp main service enclosure: powering the two 200 amp sub services, located on 1st pole: 2 - 200 amp dry type fused disconnect switches located in a deteriorated plywood non-weatherproof, non lockable enclosure.</p> <p>200 amp sub service enclosure: powering a house and 2 mobile home lots, located on 2nd pole: 3 - 100 amp dry type fused disconnect switches located inside a deteriorated plywood non-weatherproof, non-lockable enclosure.</p> <p>All sub services are overhead fed with EMT conduit and RW90 conductors extending through metal weather heads.</p>	Non-compliant
Feeders	Triplex conductors installed from the 400 amp service to the two 200 amp services. Conductors are installed through overgrown trees.	Non-compliant
Equipment	2 - 200 amp dry location splitters, 1 per sub service in each enclosure. 1 - 400 amp dry location splitter located in the main service enclosure.	Non-compliant
Feeders	AL USEI XLPE wiring installed from the "House/2 mobile home" sub service in PVC conduit to trailer splitter boxes.	Non-compliant

Non-Compliances

All Non-Compliances must be resolved by the due date unless specified otherwise in Safety Officer Notes.

Line	Code Violation and Comments	Follow up Date
1	<p>Code: C22.1-24 2-300 General requirements for maintenance and operation</p> <p>Safety Officer Note: All of the electrical distribution equipment in the deteriorated plywood enclosures shows signs of moisture and insect ingress, no maintenance has been performed.</p>	May 13, 2025

2	<p>Code: C22.1-24 2-400</p> <p>Enclosures, boxes, type designations, and use (see Appendix B)</p> <p>Safety Officer Note:</p> <p>Dry type electrical equipment is located in deteriorated plywood enclosures that no longer provide adequate weatherproof protection.</p>	May 13, 2025
3	<p>Code: C22.1-24 6-206</p> <p>Consumer's service equipment location (see Appendices B and G)</p> <p>Safety Officer Note:</p> <p>The service and distribution equipment is located in non-lockable plywood enclosures which allows for unauthorized access to the electrical equipment.</p>	May 13, 2025
4	<p>Code: C22.1-24 6-116</p> <p>Consumer's service head location</p> <p>Safety Officer Note:</p> <p>The weather heads on all poles are located below the point of attachment.</p>	May 13, 2025
5	<p>Code: C22.1-24 12-3024</p> <p>Unused openings in boxes, cabinets, and fittings</p> <p>Safety Officer Note:</p> <p>There is multiple unused openings in the electrical equipment allowing for insect and moisture ingress.</p>	May 13, 2025
6	<p>Code: C22.1-24 2-200</p> <p>General</p> <p>Safety Officer Note:</p> <p>The overhead conductors feeding the 2 sub services from the main service are running through overgrown trees.</p>	May 13, 2025

As a result of the April 28, 2025, Inspection report the Respondent was issued the following warning from TSBC Investigator D.J. on June 18, 2025:

As previously communicated, failing to comply with Compliance Order No.: CE-1239 is a serious infraction that may be subject to further enforcement action, including but not limited to:

Issuance of a Monetary Penalty up to a maximum amount of \$100,000. Failure to pay a Monetary Penalty, in full, is enforceable through the Courts and may include the seizure of your property and belongings to satisfy the outstanding debt. Refer to Safety Standards Act, s.40 & 41 and the Monetary Penalties Regulation for more information.

So, you are fully informed, should you not be able to demonstrate the following to me by June 27, 2025, I intend to escalate your file to the Provincial Safety Manager, for review and decision regarding next steps:

You have obtained the services of a Technical Safety BC licensed electrical contractor to correct the identified non-compliance(s) as noted on Certificates of Inspection No.: ELHE- 4609794-2025 and No.: ELHE-2304671-2021; and the electrical contractor has obtained the required electrical permit from Technical Safety BC.

I note that on September 23, 2025, TSBC notified the occupants at each site at the Rental Property of the electrical deficiencies and provided them with a copy of the Inspection Certificate. "The letter served to notify recipients of the identified electrical hazards and the Respondent's failure to remedy the deficiencies. The notification was intended to ensure each owner or occupant was informed of the risks so that any necessary decisions related to their safety, property or financial interests could be made".

As a result of the non-compliance on the part of the Respondent, the matter was escalated at the TSBC to D.F. who is the Provincial Safety Manager. On October 6, 2025, D.F. issued a subsequent Notice to the Respondent stating that the matter had been further escalated for enforcement. The Respondent was advised of potential enforcement actions for not complying with Compliance Order No. CE-1239, including the issuance of a safety order, issuance of a new compliance order, a monetary penalty (up to \$100,000) or court ordered compliance. The Respondent was given until October 22, 2025, to submit information for consideration prior to a statutory decision on enforcement.

Based on the Investigation Report and supporting materials, on November 27, 2025, D.F. provided the tenants with an updated Notice, informing tenants and occupants that the hazards had not been corrected by the Respondent, and to refrain from accessing the plywood enclosures that contain the electrical equipment.

CEU Investigation:

As noted above, the CEU commenced an investigation pursuant to section 80.1 of the Act on September 18, 2025, based on a complaint submitted by TSBC Provincial Safety Manager D.F., that alleged that the Respondent may not be in compliance with section 27 of the Act as it relates to emergency repairs.

In the Investigation Report the Investigator brings my attention to communications that she had with the Respondent on September 26, 2025. The Investigator summarizes the conversation laid out below.

The Respondent provided a statement that is summarized as follows: The park was developed in 1974, but it has surpassed its lifespan and requires redevelopment. The park consists of 11 sites, but the Respondent does not own the manufactured homes. The park houses many tenants, exceeding the capacity of the electrical infrastructure. The Respondent added that the park is

heavily used with tenants inviting guests, bringing in additional trailers, and now seeking to charge their electric cars using the existing system. The Respondent detailed that there are no services in the area. The park is on well water and a new well was recently added. The park operates on a septic system, which previously failed and was repaired by Interior Health at a cost of approximately \$20,000. Despite the repair, the Respondent alleged the septic system still requires upgrades as the repairs funded by Interior Health were limited to repairing the system to stop the discharge of raw sewage. The Respondent maintained an inability to repay Interior Health for the cost of the repairs and purportedly offered to sell the property to clear the debt but alleged no interest from buyers. Additionally, the Respondent stated the property was also offered to the government to sell to settle the debt. The Respondent further claimed that the courts could take the property and sell it, allowing new ownership of the park.

The Respondent then provided information to the Investigator regarding rent that is collected at the Rental Property which she states is in the range of \$260 to \$295 and has only been raised for individual mobile homeowners if and when the properties changed ownership. Otherwise, she has not raised rent at the Rental Property. ownership of the manufactured homes changes. She stated that the rents are well below market value but claimed she is providing affordable housing and which she put to taxes, insurance, water and waste collection. She stated that the income from rent did not allow for upgrades to be made to the Rental Property. She stated further that tenants do want to pay more rent and cannot afford higher payments and that one tenant had not paid any rent for the past two years. As an alternative she had sought “government funding” to try to upkeep the Rental Property but stated that all those avenues had been exhausted. The Respondent added further that the sewage system failed previously requiring repairs which was ultimately paid for by the Regional Health Authority and that she was unable to pay them back. She stated that the property was offered to the government to settle the debt.

The Investigator summarized the closing statement by the Respondent as follows:

The Respondent inquired whether the CEU intended to initiate court proceedings as she acknowledged that the concern related to the electrical infrastructure is valid. The Respondent emphasized that the park required upgrades and asserted she was not disputing the issues TSBC identified. The Respondent added that if in the Investigator’s position, a recommendation for an administrative penalty should be made as there will be no compliance without financing.

The Respondent was provided with a formal Notice of Investigation on October 8, 2025, which outlined the allegations against her, requirements stipulated in the Act for landlords concerning maintenance and repairs and the potential consequences if deliberate contraventions of the Act were later determined.

Evidence from Technical Safety BC (TSBC):

The Investigator centred her focus on the actions and records of TSBC as it related to the property and as such, issued a demand for records in accordance with section 80.2 of the Act. As a result of the demand, TSBC produced a number of records including inspection reports, photographs and communications with the Respondent which the Investigator summaries in her Investigation Report and the supporting materials before me.

TSBC SO M.H. has long-standing experience with the Rental Property since receipt of the first complaint which dated back to April 2021. Over the approximate 56 months that the TSBC has been engaged with the Rental Property and the Respondent, there has been no reported compliance with the concerns regarding the electrical systems. M.H. stated to the Investigator that “equipment was initially installed in the 1970’s but had not been maintained or upgraded to meet today’s standard or demands”. I note in the supporting materials that M.H. provided photos of the electrical systems and explained further that:

The park has three plywood enclosures each on a separate wooden utility pole. The first plywood enclosure contains a 400-amp main distribution panel, which supplies power to two 200-amp sub panels named “Distribution Centre A” and “Distribution Centre B”. The second plywood enclosure contains the electrical equipment for Distribution Centre B, which provides service to two manufactured home sites (11 and 12) and the Respondent’s home. The meter for site 11 had been removed and replaced with a clear acrylic covering. The utility pole for Distribution Centre B also serves as a mid-span support for the electrical wires extending from the main distribution service to Distribution Centre A. The third plywood enclosure contains the electrical equipment for Distribution Centre A, which provides service to 10 manufactured home sites and one water pump.

M.H. explained further:

...also observed signs of water ingress, pest infestation, debris accumulation and corrosion of the equipment and emphasized that it is a serious concern. M.H. explained that damaged or poorly maintained electrical equipment could cause overheating, arcing and shock and fire hazards.

M.H. elaborated on his concerns regarding the electrical equipment, stating that during the inspection he exercised discretion and refrained from “turning the disconnect off” due to the risk associated with the rusty, aged electrical components. M.H. clarified that due to the age and condition of the equipment, operating the disconnect may not fully de-energize the system, creating a risk that the power would remain live. M.H. further noted that the opposite scenario was also possible and that the power could be turned off but fail to restore. M.H. highlighted that some Sylvania branded electrical equipment was known for this issue.

M.H. explained that stress on the electrical system through the winter months is exacerbated with increased demands for heat and lighting “thereby increasing the potential health and safety hazards to the tenants”.

M.H. stated that:

He recalled one individual stated having to repeatedly change the fuses. In addition, a contractor had raised concerns with the aging infrastructure by disclosing that wire insulation had detached when performing electrical work, which constitutes a fire hazard. M.H. stated that the contractor had provided the photos of the electrical system underneath a manufactured home. M.H. was unable to inspect the equipment as the wiring was contained in a confined space. Based on the photos, M.H. explained that the EMT (Electrical Metallic Tubing) conduit exhibited significant corrosion, and as EMT is susceptible to corrosion it should not be used underground for that reason. M.H. also noted that the electrical wires should not be under

the trailer as it makes it inaccessible, which is not compliant with the BC Electrical Code. It was also confirmed that regardless of any electrical upgrades made by a tenant to their manufactured home, if the home was connected to Crown Villa's aging and deteriorated electrical infrastructure, there would be a serious risk of electrical shock or fire, suggesting that all 11 manufactured home sites were at risk. M.H. also remarked that the trees in the vicinity of the powerlines were overgrown and not maintained. M.H. reiterated that the maintenance of the trees near the powerlines belonging to the Respondent was her responsibility.

M.H. stated that the problems at the Crown Villa were not uncommon at a number of Manufactured Home Park sites in the area however, it has been his experience that "other property owners were able to address similar concerns by prioritizing issues and implementing staged upgrades to eventually achieve compliance". In relation to how much the repairs would cost, "M.H. stated the Respondent would need to obtain the services of a licensed contractor to provide recommendations and cost estimates to rectify the electrical safety hazards".

TSBC Provincial Safety Manager of Enforcement D.F. was also interviewed by the Investigator and provided the following information:

D.F. advised that the hazard rating level was assessed at level 4, where level 5 signified a risk for fatality. D.F. confirmed that several owners or occupants received the letter from TSBC about the electrical hazards at Crown Villa, which was to ensure that owners and occupants could make informed decisions regarding their personal safety and financial interests. D.F. stated that despite no clear signs of compliance from the Respondent thus far, TSBC would continue to work with the Respondent to gain compliance.

D. F. confirmed that the current level of hazards has been assessed at a level 4 risk which is defined as "Considered to present an imminent hazard".

On November 27, 2025, an updated Notice was issued by TSBC to the owners or occupants of Crown Villa, which advised that the hazards remained unaddressed by the Respondent and outlined the potential enforcement actions that may be taken, including the possibility of disconnecting electrical services to Crown Villa.

I note further in the Investigation Report that the Investigator contacted a tenant living at the Rental Property identified as M.J.H. who provided the following information summarized by the Investigator below:

She is a long-term tenant at Crown Villa. M.J.H. stated she had resided at the park for 25 years, with the electrical system issues persisting throughout the tenancy. M.J.H. expressed concerns with the electrical system and alleged it was a fire hazard. M.J.H. asserted that the electrical system does not meet her needs and fuses require frequent replacement, recalling four to five instances during the summer of 2025. M.J.H. claimed the system provided insufficient power to adequately heat her home and a pellet stove was required to provide additional heat. M.J.H. stated that BC Hydro came to assess the issues she was experiencing but could only make repairs to their own equipment and not the privately owned infrastructure.

I note additional evidence before me contained in the supporting materials that the Respondent was issued an order against her for work completed by the Regional Health Authority on April 20, 2022, as she was not in compliance with the *Public Health Act* insofar as the sewer/septic system was concerned. The Health Authority completed the work and then registered the Order against the Title pursuant to the *Public Health Act* section 36.

Reasons for Decision:

Section 26 (1) of the Act states a landlord must provide and maintain the manufactured home park in a reasonable state of repair, and comply with housing, health and safety standards required by law.

Section 27 (1) defines, "**emergency repairs**" means repairs that are

- (a) urgent,
- (b) necessary for the health or safety of anyone or for the preservation or use of property in the manufactured home park, and
- (c) made for the purpose of repairing
 - (i) major leaks in pipes,
 - (ii) damaged or blocked water or sewer pipes,
 - (iii) the electrical systems, or
 - (iv) in prescribed circumstances, the manufactured home site or the manufactured home park.

Based on the evidence before me I accept the evidence of the TSBC SO and TSBC Investigator, who have authority pursuant to the *Safety Authority Act* to ensure compliance with the *Safety Standards Act*. The TSBC Investigator, TSBC SO and the Provincial Safety Manager all provided evidence that there is and has been a significant deterioration of the electrical systems at the Rental Property dating back to April 2021. The TSBC has been engaged with the Respondent since that time with numerous inspections, reports and orders issued against her explaining the scope of repairs required to ensure compliance with *Safety Standards Act*, and there is no evidence before me that the Respondent has taken any steps to come into compliance. As the conditions have continued to deteriorate, I find, based on the evidence before me, that the electrical systems have reached a critical state. Based on TSBC classification of risk, which I accept, the Rental Property is now at a Level 4 which is defined as "presenting an imminent hazard" which in this case has been described by TSBC Officials as risk of fire and electrical shock or electrocution.

I further accept the evidence of the TSBC SO that electrical systems pose risk to all sites at the Rental Property for the tenants or occupants living there with deteriorated electrical lines and the centralized power distribution systems that could result in a fire or electric shock or electrocution at each separate mobile home, and that the central electric systems providing power to each respective mobile home is the sole responsibility of the Respondent.

Response to the OTBH:

In submissions in response to the OTBH, the Respondent states that she agrees with the assessment and evidence provided by the TSBC officials concerning the state of disrepair to the electrical systems at the Rental Property. She does not contest any of it.

The Respondent's position is that she simply cannot afford to complete the repairs required and therefore the government should step in and provide the funds to complete the repairs because she is providing affordable housing and that the tenants do not want to increase their rent. The Respondent states that she has not increased rent since she acquired the Rental Property 37 years ago.

The Respondent further submitted that she tried to sell the property but was unsuccessful. The Respondent states that she offered to sell the property to the government (presumably the Regional Health Authority) to enable them to recuperate the costs of repairs that were made.

The Respondent closes her submissions with a request that the penalty not be levied against her as it could impact her ability to continue to provide housing to people in need, thereby suggesting that if a sizable penalty was levied against her it could result in the occupants losing their housing.

In considering the response to the OTBH I have formed serious concerns.

The Respondent appears to have failed to consider that being a landlord carries requirements at law to ensure the safety of her tenants or in this case occupants, at the Rental Property. Her decision not to increase rent for 37 years, with the exception of cases when there have been new mobile home owners joint the Rental Property, in no way absolves her of the requirements for landlords under section 26(1) of the Act to ensure that the property is provided and maintained in a reasonable state of repair, and comply with housing, health and safety standards required by law.

The Respondent had the ability to raise rents at minimum of at least once a year (notwithstanding the time during the COVID 19 Pandemic), commensurate with requirements in the Regulations, over the years. Having raised rents incrementally would have provided her with the means to ensure that the Rental Property could be maintained in a reasonable state of repair and certainly in compliance with the health and safety requirements by law. I note in the evidence before me that the assessed value of the property has increased by 124% since she purchased the property 37 years ago. There is no evidence before me that the Respondent ever considered seeking financing to complete the repairs or provided any evidence that she is currently carrying a mortgage. I find that the Respondent has not made any attempt to ensure that she is financially able to maintain the Rental Property which she is required to do in accordance with the Act, other than seek government funding. I find that the position of the Respondent is completely without merit and is untenable.

I find that the actions of the Respondent have deliberately placed her tenants at significant risk of harm and possibly death in the event of a fire or electrocution under the guise that she is providing affordable housing.

Based on the evidence before me I find that the landlord has failed in her requirements under section 26(1) of the Act to comply with the *Safety Standards Act*, and as such has continuously and deliberately contravened section 26(1) of the Act by failing to provide and maintain the manufactured home park in a reasonable state of repair, and comply with housing, health and safety standards required by law.

I am further satisfied based on the evidence before me that the Respondent has deliberately and continuously contravened the Act by failing to complete emergency repairs at the Rental Property as it relates to the electrical systems that are urgent, necessary for the health or safety of anyone or for the preservation or use of property in the manufactured home park, and made for the purpose of repairing

the electrical systems contrary to section 27(1)(a)(b)(c)(iii) of the Act.

I am satisfied based on a balance of probabilities that the Respondent, Carolyn Goldstone, deliberately and continuously failed to provide and maintain the manufactured home park in a reasonable state of repair, and comply with housing, health and safety standards required by law, and failed to make emergency repairs to the electrical system at the Rental Property continuously between April 29, 2021 and December 9, 2025, contrary to section 26(1) and to section 27(1) of the Act which in accordance with section 80.3(1)(a) of the Act may result in administrative monetary penalties.

Administrative Penalty:

RTB PG41 explains that the purpose of the guideline is to set out the policy framework and assessment criteria ordinarily used by the director in deciding whether to impose an AMP, and, if an AMP is imposed, to determine the amount of the penalty.

The Guideline includes an Assessment Guideline at Appendix A, which the Director of the Compliance and Enforcement Unit (DCEU) may use to generate a score to guide their decisions about the amount of administrative penalty to impose, where warranted. The Assessment Guideline includes a number of factors, which each receive a score. This section provides guidance on how the DCEU may interpret those factors and the criteria the DCEU will usually consider in determining a score for a factor.

The Act requires the DCEU to consider the factors set out below in assessing whether to impose an administrative penalty on the basis of a contravention. To the extent that they are applicable or relevant in a particular matter, the DCEU will assess the factors that I set out below according to the Assessment Guideline. Deviations from the Assessment Guideline may occur when its use is not applicable to or relevant to the circumstances. In some circumstances, the director may decide to deviate from this Guideline.

When considering whether to impose an administrative penalty on a person who has contravened a provision of the Act or the regulations, the DCEU also must consider the following:

- previous enforcement actions for contraventions of a similar nature by the person;
- the gravity and magnitude of the contravention;
- the extent of the harm to others resulting from the contravention;
- whether the contravention was repeated or continuous;
- whether the contravention was deliberate;
- any economic benefit derived by the person from the contravention;
- the person's efforts to correct the contravention.

RTB PG41 stipulates that an administrative penalty may be imposed for each day a contravention or failure continued or continues. Ordinarily, the DCEU will only impose administrative penalties for each day of an ongoing contravention or failure to follow a decision or order if the contravention or failure has a current and serious impact on health and safety or, with respect to demands for the production of records, when the failure significantly impedes the investigation.

However, the DCEU may also determine that the totality of the circumstances, including the public interest or the failure of previous administrative penalties for the same or a similar contravention to achieve compliance, warrants a multi-day penalty.

Assessment Factors

RTB PG41 sets out a formula to assist in determining the amount of a one-time or continuous administrative penalty.

1) Previous Enforcement Actions for Similar Contraventions

I note RTB PG41 describes an enforcement action as an action taken to obtain compliance with laws, orders, or similar legal requirements. A previous enforcement action would be an action set out above that occurred before the contravention at issue took place. The weight given to a previous enforcement action will depend on the length of time that has elapsed since the action. For example, a previous enforcement action that occurred five years ago may be given less weight than one that occurred six months ago.

The Investigator in this matter recommended a point value of 5 for this factor based on her assessment that the Respondent was issued a compliance and enforcement order from the Regional Health Authority for a matter that related to providing and maintaining the manufactured home park in a reasonable state of repair, and comply with housing, health and safety standards required by law.

In addition, the Investigator cites the enforcement actions taken by TSBC since April 29, 2021; March 25, 2022, April 28, 2025, May 22, 2025, June 18, 2025, and October 6, 2025.

As such the Investigator recommends one point for each of the enforcement actions issued against the Respondent for a point value of 5.

Based on the evidence before me I am satisfied that the correct value for this factor is **7**.

2) Gravity and Magnitude

RTB PG41 describes gravity and magnitude as referring to the severity or seriousness of the risk or potential impact resulting from the contravention, and the extent of the impact. In determining the gravity and magnitude of the contravention.

The Investigator has recommended a point value of 10 for this factor based on her assessment that the TSBC assessed the electrical system on April 29, 2021, and again on April 28, 2025. Based on the findings, the hazard rating was elevated from 3 to 4, indicating a heightened risk to the health and safety of the tenants occupying the 11 manufactured home sites, the owner, and the personal property of all occupants of the park. Based on evidence provided by the TSBC a level 4 hazard is “considered to present an imminent hazard”.

The TSBC provided additional evidence September 26, 2025, that there is always a risk of shock or fire with damaged electrical equipment. The Investigator suggests this escalation reflects heightened concerns with the contravention of sections 26 and 27 of the Act. The Investigator points to statements provided to her on September 26, 2025, where the Respondent acknowledged awareness of the heavily used, undersized, and aging electrical system, but stated she would not comply due to lack of financial resources. The Investigator suggests that the ongoing failure to address the hazards impacts the

habitability of the manufactured home park, jeopardizes the financial interests of the registered owners, tenants and occupants of the manufactured homes, and continues to pose a serious risk to their health and safety.

I find that the actions of the Respondents have directly and adversely affected the habitability of the Rental Property. I find that the gravity and magnitude of the actions of the Respondent on the tenants, occupants and Rental Property, in addition to the potential financial impact to the owners of each mobile home, has had an impact on all occupants of the Rental Property and places people of serious risk to fire, electric shock or electrocution.

I find that the Respondent's complete disregard of requirements of a landlord in accordance with the Act has an impact on public trust concerning the adherence of tenancy laws in BC which are meant to protect the rights of both landlords and tenants. The blatant disregard of tenant's rights in accordance with the Act and the requirement of landlords to not make arbitrary decisions on their own that are clearly not in compliance with tenancy laws requires a value that sanctions and deters such future actions.

I have determined that the correct value for this factor is **10**.

3) Extent of harm to others

This factor considers the actual harm resulting from the contravention.

RTB PG41 states that a person's physical or mental health can be harmed. Impacts on a person's mental state can be considered even if medical care or treatment is not required. There can also be economic and fiscal harm arising from damage to property, lost wages and revenue, or the reduction in the value of a material item.

The Investigator has recommended a point value of 10 for this factor based on her assessment that evidence provided by the occupant M.J.H. who is a long-term tenant at the Rental Property. M.J.H. stated that there were issues with the electrical system dating back to the beginning of the tenancy 25 years ago. Throughout the occupancy, M.J.H. stated having to repeatedly replace fuses at her own expense. M.J.H. also stated that the electrical system does not meet her needs and is unable to adequately heat the home, requiring a pellet stove for supplemental heating.

M.J.H. raised concerns about the potential inability to obtain home insurance citing the ongoing issues with the electrical system. This issue was highlighted in a letter from TSBC to the occupants of the park, informing tenants of the seriousness of the circumstances. M.J.H. also expressed concern about potentially losing her home should the park become uninhabitable because of the significant health and safety concerns stemming from the lack of maintenance at the park. M.J.H. stated that as her manufactured home was built in the 1970's, it would likely have to be abandoned as it would not withstand relocation due to its age and condition.

I find that the Respondent's contravention of the Act is impacting the mental health and wellbeing of M.J.H. with concerns that she may be displaced or injured because of the non-compliant electrical system. M.J.H. stated having to pay for repairs, such as replacing fuses, which may be a financial burden.

I find that based on the evidence before me that M.J.H. has suffered harm as a direct result of the actions of the Respondent. Although I am not prepared to accept that that M.J.H. is the only tenant or

occupant at the park who has suffered harm as a result of these contraventions, I must confine my decision to the evidence before me and as such there is no evidence concerning harms experienced by any of the other tenants or occupants at the property.

The Investigator stated that the evidence appears to suggest a significant impact on M.J.H. including sustained stress and frustration from having electrical issues, along with economic harm from financial strain and potential costs related to property damage to her mobile home which cannot be moved in the event the Rental Property is closed. I note that the issues with the electrical system had continued for approximately 56 months based on the evidence before me and according to evidence provided by M.J.H. these concerns date back to the 25 years she has lived at the Rental Property.

This administrative penalty assessment concerns 11 separate contraventions related to each site at the Rental Property. As there is only evidence before me concerning the impact of harm on only one of the Rental Property Tenants, I must only consider the quantum value for the impact to M.J.H. alone.

I am satisfied that the actual harm experienced by M.J.H. warrants a point value for this factor therefore the correct value for this factor is **1**.

4) Repeated or Continuous

4 (A) Number of repeated contraventions.

In RTBPG41, “repeated” is described as a person repeating the same contravention multiple times, escalating related contraventions or a person repeating the same contravention escalating over multiple tenancies.

The Investigator has recommended a point value of 1 for this factor based on her assessment that the TSBC received the first complaint April 27, 2021, regarding the electrical system which to December 9, 2025, remained unresolved. The TSBC provided evidence that there has been further deterioration of the electrical equipment since 2021 and specifically the plywood enclosure for Distribution Centre A. In conjunction with the unresolved non-compliances and further deterioration of Distribution Centre A, and the additional hazards identified with the main distribution service and Distribution Centre B, the electrical hazard rating was elevated from 3 to 4 on a scale of 5.

I find that based on the evidence before me there have been repeated contraventions at Rental Property as it relates to all 11 sites at the rental property dating back to April 2021.

Based on the evidence before me, I find that the correct value for this factor is **10**.

4 (B) Number of days/weeks/months the contravention has continued.

RTBPG41 describes a “continuous” contravention as one that is ongoing or uninterrupted.

The Investigator is recommending a point value of 5 for this factor based on her assessment that the evidence suggests that incidences of non-compliance with the electrical infrastructure at the Rental Property were initially documented by TSBC on April 29, 2021. The TSBC provided evidence that confirmed that the incidences of non-compliance remain unresolved as of December 2025.

The Respondent repeatedly stated that she would not comply due to financial constraints. The

continued failure to address the deficiencies appears to constitute an ongoing contravention of section 26(1), and section 27(1)(a), (b), and (c)(iii) of the Act, now entering its fifth year.

I agree with the assessment of the Investigator and assign a point value of **5** for this factor.

5) Deliberateness

RTB PG41 describes a deliberate contravention as one that is done on purpose. This means the Respondents intentionally or knowingly contravened the Act. A contravention may not always be deliberate at the beginning, but if the Respondents intentionally or knowingly allow the contravention to continue, the contravention may be considered deliberate.

The Investigator has recommended a point value of 10 for this factor based on her assessment that the evidence suggests the Respondent was made aware of the electrical safety hazards by TSBC on April 29, 2021. Despite multiple enforcement actions, including Compliance Order No. CE-1239, warning letters, and escalation to the Provincial Safety Manager, it does not appear that the Respondent has taken meaningful steps to address the incidences of non-compliance as confirmed by TSBC on November 27, 2025.

The Investigator points to evidence that the Respondent acknowledged that the electrical system requires significant upgrades. However, she stated that she was unable to undertake the necessary repairs due to financial constraints. The Respondent reported having applied to various levels of government for financial assistance to fund the necessary upgrades to the park, but was unsuccessful in securing any grants. The Respondent believes that she has exhausted all options available. The Respondent also emphasized her role in providing affordable housing, an issue frequently highlighted by the government, noting that the rent at the park is significantly lower in comparison to other parks. However, the Respondent also noted that despite contributing to the affordable housing stock, no government resources were made available to support the necessary upgrades to the infrastructure at the park.

The Investigator points to further evidence that according to BC Assessment, the total value of the manufactured home park is \$730,000 as of July 1, 2024, and according to Land Titles and Survey Authority of BC ("LTSA"), there is no mortgage registered on the property.

I find that based on the evidence before me it appears that the Respondent has failed to consider other financial options that may be available to her, including rent increases (up to the allowable limit or to an amount agreed to by the tenants), applying to the RTB for additional rent increase for expenses, and possibly borrowing against the equity of her property.

As noted in my reasons for decision the position of the Respondent lacks any merit and is untenable. I have found that the Respondent has exercised a choice which is not available to her in accordance with section 26(1) or section 27(1) of the Act as they are not open to interpretation.

I agree that the Respondent is deliberately contravening the Act while exercising willful blindness to the fact that as a property owner she, and not the government are responsible for financing repairs and maintenance at the Rental Property. There is no evidence before me that the Respondent has explored any options for financial support from lending institutions.

I find that the Respondent has demonstrated complete disregard to a fundamental requirement under the Act which serves to ensure that residential property is maintained in accordance with health and safety standards as required by law and to complete emergency repairs when required and further, demonstrates a deliberate disregard for the lives or safety of the tenants and occupants of the Rental Property and of the tenancy laws of BC.

I am therefore issuing a value of **10** for this factor.

6) Economic Benefit

RTB PG 41 describes economic benefit as financial gain the Respondents obtain from their contravention. RTB PG 41 also stipulates that if a landlord impermissibly attempts to contract out of the Act, the economic benefits may be substantial even though an exact or estimated amount of the total benefit may not be determinable. Assessing the significance of economic benefit depends on the circumstances of each case.

The Investigator has recommended a point value of 1 for this factor based on her assessment that the Respondent acknowledged the aging infrastructure at the Rental Property, including the electrical system. The Respondent acknowledged that the Rental Property requires upgrades, but to undertake such work, it would require a significant financial investment. The Respondent offered no specific figure or quote to the cost of making the upgrades. The Respondent further stated that the rental income generated is insufficient to fund the necessary upgrades. Currently, the Respondent has 11 rented manufactured home sites with rent at \$260 to \$295 per month per site. The Respondent stated that of the 11 tenancies, one tenant had not paid rent for nearly two years. The Respondent also mentioned being contacted by the media and expressed hope that the media coverage would highlight the challenges she was facing.

The Investigator rightly points out that without a quote from a licensed electrical contractor, the actual cost of repairs – and therefore the precise economic benefit – is unknown. However, based on the Respondent's estimate which she purportedly provided to the media, the cost savings of refusing to complete the necessary repairs and contravening the Act may exceed \$100,000. The Investigator suggests a point value of 1.

I agree with the assessment of the Investigator that the correct value for this factor is **1**.

7) Correction Efforts

The 2022 PG41 describes a respondent's efforts to correct as a mitigating factor and that the DCEU may consider:

- *what, if any, reasonable steps the respondent has taken*
- *how promptly the respondent acted,*
- *the completeness of the correction*
- *any extenuating circumstances that may have impacted a respondent's reasonable efforts*

The Investigator is suggesting a point value of 0 (Zero) for this factor based on her assessment that the evidence appears to suggest that the Respondent did not make any significant efforts to address the incidences of non-compliance. The Respondent repeatedly stated to the Investigator that she would not comply due to financial constraints despite options being available to the Respondent as a landlord.

Based on the evidence before me I find that the correct value for this point factor is **0 (zero)**.

Amount of Administrative Penalty

I note that the Investigator miscalculated the cumulative point value of the 8 factors to a point value of 41 when in fact the correct cumulative score is 42. The summary of the Investigator's assessment was for a total score of 41 which in accordance with RTB PG41 she multiplied by 142 to generate a penalty amount of \$5,822.00 which she stated that in accordance with section 80.4(1) of the Act cannot exceed \$5,000.00.

Based on my assessment of the factors considered prior to issuing a penalty, I have decided that the correct value to be applied is 44 (44 multiplied by 142 is equal to \$6,248.00) which in accordance with section 80.4(1) of the Act cannot exceed \$5,000.00. I am satisfied that based on the evidence before me that each site at the Rental Property carries the same contraventions therefore I am ordering eleven (11) one-time AMP's in accordance with section 80.3(1)(a) of the Act for \$5,000.00 each, for a total AMP against the Respondent, Carolyn Goldstone of \$55,000.00 for the continuous and deliberate contravention of section 26(1) and section 27(1) of the Act as it relates to electrical systems at the Rental Property from April 29, 2021 to December 9, 2025.

I note that the Respondent has indicated to the Investigator that she can receive correspondence related to these matters by email and therefore, in accordance with section 82(3)(e) of the Act and section 59(4)(b)(i) and section 60 of the Regulation, Carolyn Goldstone will have been deemed served on the third day after it is emailed, unless received earlier.

Administrative Penalty Additional Information:

Please note that the Act allows for separate AMPs of \$5,000.00 for each day a contravention continues. At this time, I am setting eleven (11) one-time AMPs of \$5,000.00 each against Carolyn Goldstone for a total AMP of \$55,000.00 with the expectation that this will ensure their future compliance with the Act.

If the Respondent continues to deliberately and continuously contravene the Act with respect to section 26(1) or section 27(1), AMPs of up to \$5,000.00 for each day the contravention continues may result.

Pursuant to section 80.01(4) of the Act, the director will be publishing the decision and summary thereof, including penalty payment status.

The \$55,000.00 AMP is to be made payable to the Minister of Finance by cheque, money order or bank draft. Please submit the payment to:

Scott McGregor
Director, Compliance and Enforcement
Residential Tenancy Branch
PO Box 9298 Stn Prov Govt
Victoria, BC V8W 9J8

Section 56 of the Regulation states that an administrative penalty must be paid **within 60 days** after the date of the order. **Please send your payment to my attention at the address noted above by March 10, 2026.**

****Please note**** Sections 80.3 (4) through 80.3 (7) of the Act provide opportunities for the director to consider alternatives to enforcing all or part of an AMP. Any request to consider an alternative can be sent to my attention at the address provided. As outlined in my reasons for decision you may have avenues to seek financial assistance to complete the repairs at the Rental Property which may provide you with an opportunity to request an agreement in accordance with section 80.3 (4) through 80.3 (7) of the Act.

The request should include your proposal for an agreement which must include:

- the actions you propose to take,
- the date by when you propose to have completed those actions,
- the amount by which the AMP will reduced or cancelled if those actions are completed by that date.

If an agreement is entered into and you fail to complete the required actions by the specified date, the full AMP will once again be due and payable.

Right to have Director reconsider the decision imposing the penalty

Under section 80.8 of the Act, you have the right to apply to the director for a review of the matters set out in this notice. Part 6.1 of the Act applies to any such review. Please note that, as outlined in section 80.8 (4) of the Act, a decision or order of the director may be reviewed only on one or more of the following grounds:

- a) the person couldn't be heard because of unanticipated circumstances beyond their control;
- b) the person has new and relevant evidence that was not available before the director imposed the administrative penalty;
- c) a procedural error materially affected the decision to impose the administrative penalty or the amount of the administrative penalty;
- d) a technical irregularity or error materially affected the decision to impose an administrative penalty or the amount of the administrative penalty;
- e) the director did not determine an issue they were required to determine.

An application for review of a decision or order of the director:

- a) must be made in the approved form and in the manner approved by the director,
- b) must be accompanied by the fee prescribed in the regulation,
- c) must be accompanied by full particulars of the grounds for review and the evidence on which the applicant intends to rely, and
- d) may be made without notice to any other party.

The time limit for filing an application for review is **within 15 days** after you have received a copy of this decision.

Should you wish to exercise this right, complete an Application for Review Consideration of an Administrative Penalty (form #RTB-56). Be sure to clearly indicate the grounds for the review and include all evidence that supports your claim. Submit your application along with the \$50.00 filing fee in person at a Residential Tenancy Branch office or Service BC location or by mailing the form to the Burnaby RTB office. If you submit the form by mail, ensure it is postmarked by Canada Post staff and sent within the 15-day review period. You may pay the filing fee by sending a certified cheque or money order payable to the Minister of Finance to the Residential Tenancy Branch Office or by paying in person at the RTB Burnaby Office or in person at a Service BC Office.

You can find additional information including the Application for Review Consideration of an Administrative Penalty on this webpage: <https://www2.gov.bc.ca/gov/content/housing-tenancy/residential-tenancies/compliance-and-enforcement/enforcement-process>.

Recovery of Administrative Penalty

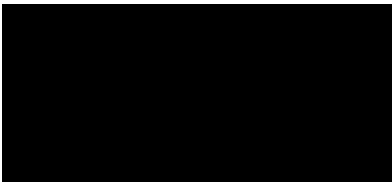
As set out in section 80.9(1) of the Act, an AMP is a debt due to the government. Failure to pay the penalty will result in the debt being referred to the Ministry of Finance where collection actions will commence and interest will be applied to this penalty.

Refusal of Service

In accordance with section 52(5)(b) of the Act, the director may refuse to accept an application for dispute resolution if

- (a) in the director's opinion, the application does not disclose a dispute that may be determined under this Part, the applicant owes outstanding fees, or AMP amounts under this Act to the government.

Yours truly,



Signature on Original

Scott McGregor
Director, Compliance and Enforcement Residential Tenancy Branch
PO Box 9298 Stn Prov Govt
Victoria, BC V8W 9J8



Enclosed:
Administrative Penalty Order
RTB PG41