Introduction:

Message thread from the date and times as shown, below. The text is verbatim, from both sides, but information following the signature was deleted for ease of reading.

When the graphics are considered, Allen's illogic, duck, dodge, distract, and demean shine's through.

Of course, they don't want to be exposed, this is a *profit center for them*, but it is arguably risky in a legal sense, and thus puts others at risk.

SECO or Roundtable, or GFA 'MHM' attendees or sponsors? **Pay close attention to the Questions that Allen, Roane and Lackey ducked in their answers.**



L. A. Tony K George F. Allen, Spencer Roane, and Tom Lackey,

gfa7156@aol.com to me, spencer, nwgaparks, gfa7156 💌

Jan 15, 2019, 12:24 PM (22 hours ago)

RE: Media Request for Comments by George Allen, Spencer Roane, Tom Lackey, SECO leadership

George F. Allen, Spencer Roane, and Tom Lackey,

The *Daily Business News* on *MHProNews* has a series of questions we hereby request that each of you individually reply to via email. Through your individual emailed replies, your respective answers can be accurately published.

At least two of you have done this before. But as a reminder and for Tom's benefit, each of you are being offered an opportunity to respond at whatever length below each question. No word limits. You may provide accompanying documents, images and/or any other evidence that supports your point.

The topics will include, but will not be limited to, reports of activities that one or more of you have been involved at various levels in A) promoting, b) participating/engaging in, and c) advocacy of and/or 'education' in various types of transactions in the manufactured home industry.

I) Questions for your individual replies.

1) In the wake of the <u>Chattanooga Times Free Press</u> and other <u>media reports</u> last year about the numerous reported allegations in Tom Lackey's communities regarding issues that arose from such 'lease

option' or 'rent-to-own' types of transactions, *MHProNews* noted that neither the Southeastern Community Owners Symposium (SECO) nor each of you individually, promoted 'rent to own' or 'lease purchase options' in the balance of 2018. Is that accurate? If not, having done so every year for many years, why not?

2) Spencer has said in public that he cleared his 'seller financing' concept with an attorney. Will you provide a copy of all those legal documents that pertain to this 'lease purchase option' or 'rent to own' types of transactions, as evidence of your good faith to those who pay to attend your so-called 'community owner' education at SECO or elsewhere?

3) Have all legal issues and possible claims reported by the <u>Chattanooga Times Free Press</u>, <u>WRCBTV</u> and other media have reported with unpaid back taxes or 'seller financing' - A) of all the residents - past or present - involved in such 'rent to own' and 'lease purchase option' or other similar 'seller financing' been completely resolved to the satisfaction of all parties? If so, how? If not, why not?

B) Have all legal issues flowing from those transactions and media reports that drew the attention of local, state, and/or federal officials from those cases in the reports linked above been resolved with the various legal jurisdictions? If so, how so? Can you provide documentary evidence of the same? If not, why not?

4) Are you aware of the case reported at the <u>link here</u>? Is there any error or fact that you'd like to point out to our readers or yours in these matters?

5) George F. Allen on his renamed blog header, which includes the phrase EducateMHC has begun to promote this same type of seller financing recently via 'rent to own' and 'lease purchase option.' <u>That's in your blog posting dated January 4, 2019</u>. For clarity and to protect the record, a composite screen capture of that and the date are shown below. Are you aware of dozens of manufactured home communities that were recently forced by a state attorney general's legal action to stop similar practices, and pay restitution?

George Allen / EducateMHC Blog

Mobile Home & Land Lease Community Advocate & Expert

 You satisfied or dissatisfied with degree & scope of MH national advocacy these days?

 MHTrade media. Selection improved during 2018; still an issue with faux muckraking?

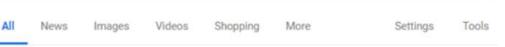
Want to know more about lease-option & other forms of chattel capital financing?

Be Careful What You Read & Believe in 2019!

6) In the light of the information linked or brought to light herein, are you prepared to indemnify those who attend your paid for 'educational' sessions against any or all legal claims that may arise from using your so-called education on 'rent to own' or 'lease purchase options' "chattel capital financing" that you each promote? If not, why not?

7) Do you recall the numerous published warnings in *MHProNews* and/or elsewhere against what the then-called Consumer Financial Protection Bureau (CFPB) referred to as 'disguises credit transactions' - which could be construed to include 'seller financing' via 'rent to own' or 'lease purchase options' or similar terminology? If so, why have you persisted at SECO and/or other educational efforts in regards to this legal questions?





Q

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1026.2 Definitions and rules of construction. - Consumer Financial ... https://www.consumerfinance.gov/policy-compliance/rulemaking/regulations/.../2/ *

(a) Definitions. For purposes of this part, the following definitions apply: (1) Act means the Truth in Lending Act (15 U.S.C. 1601 et seq.). (2) Advertisement means ... Missing: diaguised | Must include: disguised

Bureau of Consumer Financial Protection Settles with Cash Express ...

https://www.consumerfinance.gov/.../bureau-consumer-financial-protection-settles-cas... Oct 24, 2018 - ... and Improperly Seized Money From Check-Cashing Transactions. ... WASHINGTON, D.C. – The Bureau of Consumer Financial Protection (Bureau) ... transactions to satisfy outstanding amounts on prior loans, without ...

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CFPB Files First Lawsuit Under Acting Director Mulvaney | Consumer ... https://www.consumerfinancemonitor.com/.../cfpb-files-first-lawsuit-under-acting-dire... ▼ Sep 14, 2018 - The CFPB filed its first new lawsuit under acting Director Mulvaney ... Kohn, and affiliated companies alleges that they made **loans disguised** as asset ... It does not explain why the transactions are in fact extensions of credit.

8) Have you advised sponsors and/or your MHVillage website provider of your paid for 'educational' events that - according to legal sources - they may be open to liability claims from community owner attendees of your paid-for events who may put such 'education' to work, and who might later become embroiled in consumers' plaintiffs' attorneys and/or various law enforcement authorities legal claims? If so, how so? If not, why not?

9) As you likely know, MHI Chairman Joe Stegmayer has recently stepped down as Chairman, President, and CEO of Cavco Industries. One of his divisions was involved in co-sponsoring one or more or your educational events, is that correct? Was Stegmayer and/or the contact(s) at a whatever division of Cavco Industries (CVCO) that made the arrangements for co-sponsoring such 'education' at SECO or elsewhere made aware of the contents of the education? Did any of them attend such 'educational' sessions on 'seller financing' via 'rent to own' or lease purchase options?

10) George Allen's 'EducateMHC' blog - which arguably inaccurately claims to be the "This blog posting is sole national advocate, official ombudsman, historian, research reporter, education resource, & online communication media for North American lease communities!" reported on Stegmayer taking a new role at Cavco. Did he or anyone involved at Cavco provided feedback or input before or after that was published? Are you aware that Stegmayer stepped down as a result of a formal Securities and Exchange Commission (SEC) inquiry? Are you aware that several plaintiffs' attorneys for stockholders are involved in the matter?

11) You recently stated that one or more state association leaders agreed with and supported your call for a boycott of what you logically meant was *MHProNews*. It's the logical implication of your various posts messages, because you named those that were okay to read, which left MHProNews by implication as being the one to boycott reading, is that correct? Would you like to confirm, clarify, or clear that call for a boycott matter up?

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SHAREHOLDER ALERT: Kaskela Law LLC Announces Investigation ... https://globenewswire.com/.../SHAREHOLDER-ALERT-Kaskela-Law-LLC-Announce... *

Nov 13, 2018 - SHAREHOLDER ALERT: Kaskela Law LLC Announces Investigation of Cavco Industries, Inc. and Encourages Investors with Losses in Excess ...

SHAREHOLDER ALERT: Investigation of Cavco Announced by Holzer ... https://www.barrons.com/articles/PR-CO-20181113-915154

Nov 13, 2018 - ATLANTA--(BUSINESS WIRE)--November 13, 2018--. Holzer & Holzer, LLC is investigating whether certain statements made by Cavco ...

SHAREHOLDER ALERT: Investigation of CavcoAnnounced by Holzer ...

https://www.marketwatch.com/.../shareholder-alert-investigation-of-cavcoannounced-...
Nov 13, 2018 - Holzer & Holzer, LLC is investigating whether certain statements made by Cavco
Industries, Inc. ("Cavco" or the "Company") CVC0, +1.68% ...

Cavco Shareholder Suits Prepping, CVCO, SEC, Insider Responses to ...



www.mhmarketingsalesmanagement.com > Home > Analysis and Commentary ▼ Nov 15, 2018 - At least two law firms are calling on Cavco Industries (CVCO) shareholders to contact them, as they advance investigations that aim to ... A Worthwhile New Year's Resolution:

Do Be Discerning About The MH Media You Read, Believe & Use During 2019!

Yes, this was the gist of Part III of blog posting # 514 last week, and enough of you responded positively to the 'media discernment challenge' to make it worthwhile to reiterate here. One veteran state MH association executive had this to say about the matter:

"I am totally on board with your industry New Year's resolution! Out with the derisive negativity, and in with communicating the positive attributes of manufactured housing and land lease communities."

How 'bout you? Ready and willing to focus your manufactured housing trade reading on state MH newsletters, the MHInsider magazine, Manufactured Housing Review online ezine, and the Allen Letter professional journal (transitioning from print to digital format)? Sure hope so. Those four are all you need to stay abreast of trade news throughout the industry and real estate asset class. Contact me via gfa7156@aol.com if you need help contacting these pubs.

III.

A Final Thought for Year 2018, but Key for 2019

Possible antitrust trigger phrase.

MHPRONISTES-

No names here, but hope you too boycott an ongoing online MH-related news media attempt to denigrate and divide us as an industry and realty asset class!

In my opinion, life is too short to be making crass and obtuse claims of national advocacy conspiracy, corporate antitrust imaginations, and disgusting personal attacks, only befouling internet platforms better used to promote manufactured housing and the land lease community lifestyle!

Is there anyone who doesn't see how much of what's being put forth as industry 'news' is little more than thinly-veiled efforts, on the part of one industry advocate, to smear and denigrate another?

If so, join me in 2019, committing to read only print and online trade publications advancing the causes, and improving the image, of HUD-Code manufactured housing and land lease communities! No more caterwauling ('to fight like cats') in public and in private. Period.

http://community-investor.com/george-will-soft-side-of-leadership-mh-media/

12) As you know, the Manufactured Housing Institute (MHI) - which George Allen's blog and other published or emailed writings have part-time defended, and part-time criticized or attacked - calls state associations their 'affiliates.' What feedback or input - if any - have you had from anyone associated with MHI, staff, members, or 'leadership' such as Joe Stegmayer, those associated with a Berkshire Hathaway brand involved in manufactured housing, in your published call for a boycott of MHProNews? Have any of them advised any of you that a boycott in this context - per legal authorities - can be construed as an antitrust violation?

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	It is a form of refusal to deal, and can be a method of shutting a competitor out of a market, or preventing entry of a new firm into a market. In the United States, such conduct can be held to violate the Sherman Antitrust Act .								
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13) George F. Allen and/or others in your circle have been known to have allegedly raised concerns about my lawful use of pen names. Is that an effort to undermine our work in the industry, or the credibility of our MHProNews reports? Is there any factual or logical issues you care to raise or dispute in the current or prior issues of our emailed headline news and their linked contents? See reports, below, and please let me know directly - instead of indirectly though other sources.

14) George F. Allen – you for many years advertised and promoted 'mystery shopper' services to manufactured home industry companies, for a fee of course. On occasions in public, you described various disguises you wore while conducting such 'mystery shopping,' which we are not herby implying is necessarily illegal. You presumably did not – while mystery shopping - introduce yourself as George F. Allen, manufactured home industry professional, and retired Marine Lt. Colonel, is that correct? Do you see any hypocritical or logical disconnects between a practice that you engaged in yourself, and yet you have purportedly attempted to mischaracterize as somehow illicit on my lawful and morally licit use of a pen name?

a) Are you aware, as what you describe yourself as an official 'historian' for the industry, that some of America's founding fathers used pen names? Are you aware that actors and authors - Samuel Clemens writing as Mark Twain comes to mind as an example - use stage or pen names?

b) If so, then why have you attempted to mischaracterize any similar use by me to industry members verbally, in person, by phone and/or email - the later of which obviously involved use of what various aspects of the RICO law calls 'the wires' - of pen names?

c) Do you have any evidence of any criminal wrongdoing, civil actions lost, or convictions for any crime whatsoever by me of any use of a pen name or any other name? Or do you have any evidence of any other unlawful professional claim or issue? Is so, please provide the evidence for that to me for publication. If not, please clarify these mischaracterizations of reality with a public apology in your next blog post, and by email to all of those you've raised such issues with. 15) George F Allen, please explain the financial relationships - if any - between yourself, your daughter, and a reportedly failed manufactured home community investment. Please provide the relevant dates, location, people's names, business name(s), and other details involved. And have you advised your readers and those who pay for your education of this alleged matter?

16) George F. Allen, as you may know, there have been anonymously sent items via U.S. Mail to me, which a federal investigator has said appears to be an effort to silence us from reporting various issues in the manufactured housing industry involving MHI, and some of their so-called 'big boy' company members. What role, if any, have you or those in your circle played in this matter? What knowledge of connections between this alleged misuse of the U.S. Mail, MHI, and their 'big boy' company members are you aware of? Are you aware that this can be a violation of not only postal regulations - a federal crime - but can also be, per legal sources, a predicate crime in a RICO legal action?



Mail and Wire Fraud: A Brief Overview of Federal Criminal Law ... https://www.everycrsreport.com/reports/R41930.html -

Jul 21, 2011 - The federal **mail and wire** fraud statutes outlaw schemes to defraud that involve the has no history of drug **abuse** and drug **abuse** played no role in the offense. **RICO** has one of the first contemporary forfeiture provisions, ...

Mail and Wire Fraud – Jeffrey E. Grell



https://ricoact.com/?page_id=53 *

The extensive use of RICO in the civil context is almost solely attributable to the inclusion of mail and wire fraud as predicate acts. Sedima, S.P.R.L. v. Imrex Co. Missing: misuse | Must include: misuse 17) George F Allen and your circle of colleagues, are you aware that certain RICO cases can involve civil as well as criminal forfeiture of property?

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	Types Of Federal Forfeiture AFP Department of Justice https://www.justice.gov/afp/types-federal-forfeiture Feb 1, 2017 - Criminal forfeiture is an action brought as a part of the criminal Racketeer Influenced and Corrupt Organizations (RICO), as well as money laundering Civil judicial forfeiture is an in rem (against the property) action brought								
	[Por] The Scope of Criminal Forfeiture Under RICO - Chicago Unbound chicagounbound.uchicago.edu/cgi/viewcontent.cgi?article=2639&context * by A Malani - 1999 - Cited by 9 - Related articles								
MHPRO(213773	lation may bring a civil forfeiture action to limit investments in, RICO Criminal Forfeitures and White Collar Crime, 80 J Crim L & Criminol 197 (1989), 1290.								

18) Once more, will each of you personally indemnify your MHCEducate, SECO or other students and sponsors against any legal claims, expenses or losses that may arise from their use of your so-called education?

19) Oh yes, at any time that you published, emailed, or otherwise shared (misleading) information about me, our firm, or any of operation's work that we've performed - that you communicated to others in the industry - did you ever extend to me a similar courtesy of giving me a chance to explain or comment on it, in advance? After the fact? Can you explain why or why not?

II) There are several other topics to cover, but that's sufficient questions for now. Please protect and preserve all papers, electronic records, communications, devices, or any other documents, or journals or any records of any kind that involve any of the above issues. Parties in the BCC of this may find those of interest.

We plan to publish a report on related topics to the above Wednesday (tomorrow afternoon) or Thursday. So please send your responses in by midnight tonight.

Again, you can take as much space under each question above, as needed, for any of your individual replies.

III) You are also hereby invited to provide any corrections of facts, quotations, videos, documents, or flawed logic in any report on *MHProNews* which might begin to rise to a level that would merit a call for a coordinated boycott? If your boycott is aimed at someone else, or includes any other organization - such as MHARR - please so indicate in your response.

IV) In conclusion, George, in my experience, people who attempt to silence differing voices are often unable to withstand the scrutiny of a robust and authentic discussion of the issues involved. After all, if those that would silence others could successfully dispute a debatably point, why do they not just do so?

Beyond the questions, which are authentic, care to debate these or other issues publicly George? Or is using reason vs manipulation asking too much?

You claim to want to help individual community owners. You've personally, on prior occasions, cited monopolistic practices to your readers. Why the switch, and defend MHI et al? Why have you become their surrogate, instead of defending your so-called members' interests?

 Why ongoing disunity & political ineffectiveness at the national advocacy level?

'National manufactured housing advocacy' today?

Some say OLIGARCHY. But what is that?

'Governing power in the hands of the few'



'OLIGARCHY Revisited...' Are manufactured housing leaders 'spoiling' (i.e. 'seriously impairing') our industry by acquiescing to energy saving innovations cum sales price increases, on new HUD-Code homes, when home buyers can least afford to buy? Or as pundits suggest, is this ruse a precursor to amalgamation of many firms into a very few?

Credits: George Allen's blog.

Have you advised your readers and followers what the cost to their property and business value is for the alleged market manipulation engaged in by Clayton, 21st, Berkshire Hathaway, et al?

This was updated, just FYI:

https://www.manufacturedhomelivingnews.com/bridging-gap-affordable-housing-solution-yields-higherpay-more-wealth-but-corrupt-rigged-billionaires-moat-is-barrier/

We await your replies to any or all above. Hopefully, by midnight tonight, so we can include your replies in an upcoming report.

Thank you.

Tony

L. A. 'Tony' Kovach MHLivingNews.com | MHProNews.com | Office **863-213-4090** |

Connect on LinkedIn: http://www.linkedin.com/in/latonykovach

+++

Whether you think you can or whether you think you can't, you're right. - Henry Ford

gfa7156@aol.com to me, spencer, nwgaparks, gfa7156 Jan 15, 2019, 12:48 PM

GFA's and TK's signature info deleted for brevity, but the messages are otherwise as sent.

Tony

No helpful reply from this end. *Why?*

Your reputation for taking interviewee comments out of context, using them to suit whatever story you're fabricating, and often not until months later, is well known - and widely disparaged!

GFA.

George Allen...



L. A. Tony K <latonyk@gmail.com> Jan 15, 2019, 2:55 PM to George, Spencer, nwgaparks, bcc:

Tony

No helpful reply from this end. Why?

Your reputation for taking interviewee comments out of context, using them to suit whatever story you're fabricating, and often not until months later, is well known - and widely disparaged!

GFA.

George Allen

George, At about the same time as your reply was this:

"Tony...as I think you know, it's ALWAYS been my position that lease option and rent to own are illegal if they are a "workaround" for chattel financing, which is what most such schemes are," said a non-association attorney who was bcc'd in the message sent to the three of you.

Another tells me that Spencer has been whining to others about some inaccuracy in our recent report, linked below.

State AG Files Suit Against, Manufactured Home Community, Rent to Own, Lease Purchase Option Warning

Where? How so? Give specifics, because your vague generalizations prove nothing, other than the obvious. That you won't answer relevant questions about the legality of what you are profiting from 'teaching' often vulnerable, trusting community owners.

Unlike some, MHProNews provide the genuine opportunity for accurate input. Other than you, I've not had *anyone* say we've misquoted them. Why is that? Quite the contrary, Tim Williams/21st said in writing that we have a reputation for correcting errors in any fact-claim, and allowing for third-party input. So your claims is specious, and thus stands challenged.

So, take your excuse to not reply to those you want to profit from, by selling them "information" that has proven to caused legal heartaches and headaches for consumers and businesses alike. What you've sent will be part of the upcoming report, but I'll give Tom and Spencer an opportunity to reply too.

Sponsors of Allen, Roane, and SECO? Caveat emptor.

Thanks,

Tony

gfa7156@aol.com Jan 15, 2019, 3:18 PM Allen, Roane, Lackey - SECO 'leaders' all declined substantive replies to serious concerns. The rest is duck, run, attack, distract.

Forewarned is forearmed! So 'telling' he doesn't identify the 'non-association attorney who was bcc'd in the message sent to the three of you (us)'. Must not realize that's like saying 'no attorney said anything at all'. So poor.

Know how to best counter the "...not had *anyone* say we've misquoted them" comment? Remind him of the numerous writers, who've come and gone, 'trying to work with him' during the past decade. Only his wife and Silver (I think) remain.

GFA

George Allen...



L. A. Tony K <latonyk@gmail.com> to George, Spencer, nwgaparks, Jan 15, 2019, 3:33 PM

Look in the mirror, George. Your 'argument' applies to *you*. It's known in debate as a **'red herring.'** The rest of what you do are **`Ad hominem**,' both duck the issues.

The attorney wanted anonymity, he was given it. You're still ducking substantive questions.

We cited other legal sources, including the CFPB. What's wrong? Why not deal with those, that you have the names for? Fear the truth? Don't want to answer what's self evident?

If the NY AG went after that community, why do you think AG's in other states won't go after your 'students' who take the risk of practicing what you and Spencer preach?

What about those residents that got the shaft? How do you think it makes the industry look? Why is the industry going backwards in new home shipments? There are many factors, but what you are teaching is arguably among them. What happened to you George? You preach "legacy," what are you doing to your own?

Man up, and answer. The rest are arguably dodges and deceptions you attempt, so can keep *picking the pockets of those who trust you.*

Tony

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Third Party Images Are Provided Under Fair Use Guidelines.



This is provided as part of a detailed report and analysis, at the link located below.

http://MHProNews.com/blogs/tonykovach/manufactured-housing-institutes-three-stooges-seco-leadersgeorge-f-allen-spencer-roane-tom-lackey-and-rent-to-own-scams

There is a download from the NY State Attorney General's office that is related to this issue. See the link above for more details.