



Manufactured Housing Association for Regulatory Reform

1331 Pennsylvania Avenue, NW • Suite 512 • Washington, DC 20004 • 202-783-4087 • Fax 202-783-4075 • mharrrdg@aol.com

May 12, 2025

VIA FEDERAL EXPRESS

U.S. Department of Housing and Urban Development
Freedom of Information Act Office
Room 10139
451 7th Street, S.W.
Washington, DC 20410-3000

Re: Freedom of Information Act Request

Dear Sir or Madam:

The Manufactured Housing Association for Regulatory Reform (MHARR) and the undersigned, as its chief executive officer, hereby request, pursuant to the Freedom of Information Act (FOIA) 5 U.S.C. 552, that copies of the following documents be provided to us:

1. All documents reflecting or relating to communications between former HUD Deputy Assistant Secretary for Manufactured Housing (DAS), Teresa Payne (Payne), and any person not employed by the U.S. Department of Housing and Urban Development (HUD) (or other federal government agency) from November 1, 2024 to the present;
2. All logs or other records reflecting or relating to the occurrence of communications between Payne and any person not employed by HUD (or other federal government agency) from November 1, 2024 to the present;
3. All documents reflecting or relating to communications between Payne and any entity other than an office, program or activity within the organizational structure of HUD from November 1, 2024 to the present;
4. All documents or communications between Payne and either the Office of Governmental Ethics (OGE), the Office of Management and Budget (OMB), the Office of Personnel Management (OPM), HUD General Counsel, or any other office within HUD regarding the post-employment ethics obligations of federal employees and officials;
5. All communications or documents reflecting any guidance provided to Payne by any office, including but not limited to those referenced in Request No. 4, above, regarding post-employment ethics and post-federal employment by or on behalf of a party

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regulated by the HUD Office of Manufactured Housing Programs (OMHP) and by Payne, as DAS with authority over OMHP, from November 1, 2024 to the present;

6. All communications or documents reflecting any decision (preliminary or final) by a federal board, panel, official, or employee within or outside of HUD, regarding the post-federal employment of Payne by or on behalf of any party regulated by OMHP and Payne, as DAS of OMHP (including an organization having regulated members), from November 1, 2024 to the present;
7. Any document or communication provided to HUD (either directly or by copy) by Payne regarding the end of her employment as DAS by HUD;
8. Any document or communication provided to HUD (either directly or by copy) by Payne regarding her new employment by the Manufactured Housing Institute (MHI);
9. All documents reflecting communications between Payne and the Manufactured Housing Institute or any person employed by or acting on behalf of MHI, from November 1, 2024 to the present;
10. All documents reflecting communications between Payne and any member (or employee or representative of any member) of MHI from November 1, 2024 to the present;
11. All documents reflecting or relating to any OMHP matter (enforcement, regulatory or otherwise) from which Payne recused herself, from November 1, 2024 to the present;
12. Documents reflecting all OMHP enforcement matters under Payne's direction, authority or purview, including the name of the private sector entity involved and the nature of the alleged or investigated activity (including all matters investigated by OMHP contractor, the Institute for Building Technology and Safety (IBTS) from November 1, 2024 to the present;
13. All documents reflecting or relating to Payne's attendance at a March 2025 event sponsored by the California Manufactured Housing Institute (CMHI);
14. All cost or expense records and/or reports, and/or reimbursement requests, receipts or confirmations relating to Payne's attendance at a March 2025 event sponsored by CMHI;
15. All documents reflecting any federal government reimbursement, stipend, or other payment made in connection with Payne's attendance at a March 2025 event sponsored by CMHI.

The term "document" as used herein, includes records of electronic communications and both written and electronic records of telephonic communications and includes all drafts or versions of identified documents.

The documents requested herein are sought in the public interest concerning the immediate-post-federal employment of a senior, policy-level federal (i.e., HUD) regulator by an entity (i.e., MHI) which includes members formerly regulated by that individual and the program administered by that individual (i.e., OMHP) during the time period covered by this request. As such, the documents requested herein concern the operation, activities, transparency and accountability of the HUD manufactured housing program and its compliance – and the compliance of its past and current officials – with applicable law, regulations and federal policy, and not primarily for any commercial interest of the requester.

If all or part of this request is denied, please cite each specific FOIA exemption which you contend justifies the said denial and advise us accordingly.

If you have any questions about processing this request, you may contact me during business hours at (202) 783-4087. We also ask that you please acknowledge receipt of this request in writing.

Thank you in advance for your assistance.

Sincerely,



Mark Weiss
President and CEO

cc: Hon. Scott Turner
Hon. Russell Vought
Hon. Susan Wiles
Office of Government Ethics