Draft for AI fact check and analysis of pending article on MHProNews.

Mobile and Manufactured Home Residents and Staff in Predatory MHC Managed Properties Can CA\$H IN With Whistleblower Tip\$ 'Hell of a Job' plus Sunday Weekly MHVille Headlines in Review with FEA



"Wow! You did dig deep. I hope it opens the eyes of legislators who really want affordable for low and fixed income individuals that stays affordable. In the discussion for housing nationally, that has been missed. There has to be profit based on actual expenses & maintenance with oversight. Hell of a job." - Fred Neil, Dover Council President, and per reports a longtime manufactured homeowner/community resident/advocate for reforms in RHP Properties land lease community. That quote from 7.9.2025 is on the record from Neil regarding one of the deep dives into one of several MHVille facts-evidence-analysis (FEA) reports for the week in review that follows in Part II. But the first part of today's headline points to another item found in Part II, but which will have additional insights from other sources quoted in Part I of today's report with MHProNews' trademark FEA that includes third-party artificial intelligence (AI) fact checks for accuracy that yield additional insights.

No one else in MHVille trade media offers the depth and array of coverage MHProNews does, which may explain why xAI's Grok – and other AI fact checks – have confirmed that MHProNews has some 6x the readership of the arguably corrupt and often misleading

Manufactured Housing Institute (MHI) and several MHI allied bloggers and trade publications.

With that brief tee up, let's dive into Part I.

Part I

As the deep dive report in Part I for Saturday 7.12.2025 will explain, there has to be some connection with the U.S. Postal Service (such as an antitrust linked violation that used the U.S. Mail) to tap into this new Whistleblowers Reward program. Quoting from part of what follows: "The [new DOJ antitrust division] policy implies that even the most covert conspiracies are susceptible to detection since individuals now have a financial incentive to disclose."

1) According to <u>Baker McKenzie Law</u> at this link here is the following provided under <u>fair use</u> guidelines for <u>media</u>.

United States: Blowing the Whistle on Collusion – New DOJ Antitrust Division Program

10 Jul 2025

In brief

The Department of Justice's Antitrust Division, in partnership with the U.S. Postal Service, has launched a Whistleblower Rewards Program to combat antitrust crimes. Following the DOJ Criminal Division's launch of a whistleblower pilot program last year,1 the Antitrust Division is now offering a reward to whistleblowers. Under the new program, individuals who report credible and timely evidence of antitrust collusion—such as price-fixing or bid-rigging and certain monopolization cases—may receive up to 30% of recovered criminal fines. This marks a significant step in expanding detection tools for antitrust violations, with reports to be submitted through a dedicated DOJ webpage.

Key takeaways

- The Whistleblower Rewards Program marks a major enforcement shift by offering financial incentives for reporting potential antitrust crimes.
- The program is designed to encourage people to come forward with credible information that can help enforce antitrust laws.
- It expands the DOJ's toolkit for detecting collusive conduct like price-fixing and bidrigging, while reinforcing interagency coordination with the U.S. Postal Service

Inspection Service and the U.S. Postal Service Office of Inspector General (USPS OIG).

- By enabling individuals to report directly and potentially receive up to 30% of fines collected, the program may strengthen deterrence across multiple industries— including industries where the USPS procures goods and services either directly or indirectly.
- It also signals DOJ's growing reliance on informant-led investigations to uncover and prosecute complex antitrust violations.

In more detail

The Whistleblower Rewards Program represents a significant development in antitrust enforcement, particularly in areas that are difficult to monitor, such as procurement. By offering financial incentives for individuals to provide "specific, credible, and timely information," the program directly addresses the challenge of uncovering cartel activities, often conducted in manners difficult to detect.

From a deterrent perspective, this shift alters the risk calculus for potential offenders. The policy implies that even the most covert conspiracies are susceptible to detection since individuals now have a financial incentive to disclose. For the Antitrust Division, this could result in earlier detection, higher-quality evidence, and more efficient investigations.

Notwithstanding its potential, several considerations remain about the program's implementation and practical effectiveness. Its success hinges on how accessible and protective the reporting process is, and whether potential whistleblowers perceive the program as worth the risk.

The program's objective is said to "incentivize individuals and companies about collusive behavior without the fear of reprisal." To support the program, the DOJ launched a dedicated Whistleblower Rewards Program webpage,² and key information on antitrust crimes. Any award is subject to the terms of a Memorandum of Understanding³ (MOU) the Antitrust Division has with its law enforcement partners.

The MOU establishes eligibility criteria, reporting instructions, outlining and defining limitations and conditions. If an individual voluntarily reports original information about antitrust violations that lead to at least \$1 million in fines or recoveries, they may receive a reward. The Antitrust Division will ultimately have discretion on whether to grant the reward, "but if a whistleblower is eligible for an award the presumptive award amount will be between 15 and 30% of the amount of the criminal fine or recovery."

Further, this initiative aligns with broader global trends in competition law, emphasizing enforcers' interests in proactive detection, leveraging informants, employing reward mechanisms, and building enforcement synergies. This heightens the stakes for those engaged or who may engage in collusion, signals a serious commitment by the Division, and has the potential to significantly enhance its enforcement scope and capabilities.

Companies should expect more oversight and enforcement, underscoring the need for companies to enhance their compliance programs. This raises the stakes for compliance failures and increases the likelihood of investigations initiated through whistleblower tips. Companies should take this as a further incentive to strengthen internal controls, ensure their procurement practices are in compliance with antitrust laws, and reinforce a culture of compliance to mitigate any potential exposure and reputational harm.

Put differently, those who have knowledge of potential crimes and have carefully followed MHProNews for years, or those who may have such knowledge and are ready to dig into articles on MHProNews/MHLivingNews that can help them properly frame their claim could literally cash in through the new whistleblower rewards program.

But MHProNews will provide another example from a legal website on the same topic to further illustrate the possible threat to multiple current or past Manufactured Housing Institute (MHI) member firms and/or those who are members of an <u>MHI linked state</u> <u>association</u>.

2) From the <u>Lexology legal website at this link here</u> is the following provided under <u>fair use</u> guidelines for <u>media</u>.

Note the opening sentences (bold added for emphasis): "**Cartel conduct tends to occur in** secret. As a result, the Antitrust Division has long focused on augmenting its abilities to identify conspiracies and to incentivize self-reporting of conduct that may otherwise go undetected." The reason that conspiracies to break a law are covered under federal and/or state laws is precisely because they can, have, and do occur. Evidence of collusion or conspiracy to violate antitrust laws, that may or may not include violating other federal laws (think <u>RICO</u> or <u>Hobbs Act</u>, <u>SEC</u> among others) could prove to be valuable information.

New Incentives, New Rewards: What You Need to Know About the Antitrust Division's First-Ever Whistleblower Rewards Program

Axinn Veltrop & Harkrider LLP

July 10 2025

Cartel conduct tends to occur in secret. As a result, the Antitrust Division has long focused on augmenting its abilities to identify conspiracies and to incentivize self-reporting of conduct that may otherwise go undetected. Traditionally, its <u>Leniency Policy</u> — by which those who self-report cartel conduct and meet the program's requirements receive nonprosecution protection — was its core carrot. Now there's another. A new whistleblower rewards program, announced in partnership with the United States Postal Service (USPS), offers the possibility of a financial reward for reporting antitrust conspiracies to fix prices, rig bids, or divide markets. The potential reward is significant: up to 15-30% of resulting criminal fines or recoveries for voluntarily providing the Antitrust Division with original information about antitrust and related violations.

Here's what you need to know about the Antitrust Division's game-changing whistleblower rewards program:

How will the Antitrust Division administer the program?

The Division has established a <u>website</u> to facilitate public reporting and will designate attorneys and staff to vet submitted reports. Payment to whistleblowers comes through USPS, however, whose Office of the Inspector General (OIG) is a longtime law enforcement partner of the Antitrust Division with a surprisingly broad investigative mandate.

Why is the program in partnership with USPS?

Because payment comes from USPS, the program is limited to fines and penalties arising out of matters affecting the Postal Service, its revenues, or property. That's because USPS has a statutory ability to collect fines and penalties obtained from violations of law affecting the Postal Service and to share up to half of those penalties with informants.^[1]

The bar for what "affects" USPS appears to be low. As a result, it would be incorrect to assume that this is a narrow program. A <u>Memorandum of Understanding</u> implementing the new program explains that the violation must lead to the conclusion that "the Postal Service has suffered an identifiable harm," but "the harm need not be material or otherwise pose any substantial detriment to the Postal Service." USPS is America's second-largest <u>employer</u>, with <u>\$79.5 billion</u> in operating revenue, and <u>8,515</u> properties. Its scale, scope, and employee base are likely to mean broad jurisdiction. Prior USPS OIG antitrust cases illustrate a broad view of USPS's mandate. For instance, USPS partnered with the Antitrust Division to investigate price fixing of <u>generic drugs</u>.

One area to watch is labor-related collusion, where effects may be harder to tie to USPS than price fixing. Even there, however, both USPS and DOJ have an incentive to promote this new program by rewarding whistleblowers wherever possible.

How much can whistleblowers receive?

The potential reward is significant: the Antitrust Division has sole discretion over the reward amount, but the program creates a presumption that at least 15% of the recovered criminal fine will be rewarded, up to a maximum of 30% of the recovered fine. Considering fines for antitrust violations have reached as high as \$925 million, whistleblowers could potentially collect bounties in the millions of dollars.

If the investigation results in a criminal fine (or equivalent recovery from a deferred prosecution or nonprosecution agreement) of at least \$1 million, the Antitrust Division will approve USPS's collection of a portion of that fine or penalty. In turn, USPS will pay the whistleblower.

What requirements must whistleblowers meet to be eligible for a financial reward?

An eligible whistleblower is any person who: (1) voluntarily; (2) provides original information; (3) regarding an "Eligible Criminal Violation," including anonymously through an attorney. However, a person who acted as the leader or originator of the illegal conduct, or who forced another person to participate, will not be eligible for the program. In fact, the online whistleblower submission form notes that individuals who believe they have been involved in a violation can apply for leniency. Importantly, the leader, originator, or coercion exclusions match those under the Leniency Policy, which are <u>narrowly construed</u> to incentivize leniency applicants.

<u>Voluntarily</u>: A whistleblower report is considered to be provided voluntarily when "specific, credible, and timely" information about possible violations is directly communicated to one of the relevant law enforcement agencies *before a formal demand*, such as a grand jury subpoena, is issued that would compel the whistleblower's testimony or other document production revealing the violation. This information could potentially also yield Type A leniency, which requires prompt reporting before the Antitrust Division has begun an investigation into the conduct, but some daylight may exist between those two standards.

<u>Original Information</u>: To be considered "original information," the whistleblower submission must be truthful and complete, and not already known to the relevant law enforcement agencies. Most importantly, it must be derived from independent, personal knowledge, and not from publicly available sources, including allegations from a court or a governmental report or investigation. Such personal knowledge may include "experiences, communications and observations in business or social interactions, or from independent analysis of public or private data." Whether and when "independent analysis" of bidding or pricing data, for example, will be sufficient to earn benefits under the program will be interesting to watch. The program carves out from eligibility several types of potential reporters, subject to certain caveats, for example, information learned by company agents such as attorneys (through privileged communications) or by company compliance officers.

<u>Eligible Criminal Violation</u>: The standard criminal antitrust offenses are presumptively eligible, including criminal violations of Sections 1, 2, and 3 of the Sherman Act, violations affecting government procurement, and other federal criminal violations that attempt to effectuate or conceal Sherman Act violations. However, the Antitrust Division holds ultimate discretion to determine whether a potential or actual violation of a federal criminal statute is eligible. That is potentially different from and broader than the Leniency Policy, which only applies to violations of Section 1 or 3(a) of the Sherman Act, along with other offenses "<u>in furtherance of</u>" the conspiracy to fix prices, rig bids, or allocate markets.

What does this mean for companies and their compliance efforts?

The chances that cartel conduct will be detected have just increased dramatically.

With significant financial incentives now available, employees (and even third parties) have stronger motives to report suspected antitrust issues. This places a greater importance than ever before on enhancing internal compliance mechanisms, such as: implementing, monitoring, and acting upon *internal* whistleblower complaints, updating antitrust training content, monitoring internal conduct, and promoting a culture that rewards raising concerns internally before individuals might take external action.

Indeed, the whistleblower program further encourages internal reporting. The Antitrust Division will credit the time of a whistleblower's internal disclosure to compliance officials as the date of the disclosure to the Antitrust Division *if* the whistleblower can demonstrate that they reported their information to the Antitrust Division within 120 days of the internal corporate report. Companies have long been in a race for leniency, and the possibility of a whistleblower reward expands that race and raises its stakes.

It also goes a step further. If a whistleblower internally reports misconduct and the company fails to further report it to DOJ within 120 days, executives who learned about the violation but would otherwise have been ineligible become potentially eligible for a whistleblower reward. In short, the program further emphasizes prompt corporate self-disclosure when learning of potential antitrust violations.

Companies should also review their own whistleblower protection mechanisms and ensure anti-retaliation safeguards are in place to avoid hampering individual reporting.

What does this mean for the Division's Leniency Policy?

The Leniency Policy remains intact and is designed for companies and individuals involved in antitrust misconduct to self-report in exchange for immunity. The new whistleblower program is aimed at outsiders or insiders not directly involved in the conduct—such as employees, former employees, competitors, customers—who can report violations and receive financial rewards. The new whistleblower program adds significant urgency and pressure to a company to quickly report illegal conduct to the DOJ, or risk losing the race to report not only to a competitor, but now also to a whistleblower who may trigger a government inquiry that eliminates the potential to achieve Type A leniency.

Are individuals who participated in a violation eligible whistleblowers?

Yes. There is no general eligibility bar based on participation in the misconduct. But individuals are ineligible if they coerced another party's participation or were clearly the leader or organizer of the activity, a preclusion that would also render the individual ineligible for individual leniency.

Are companies eligible whistleblowers?

No. The program applies to "individuals." But companies that receive internal reports can use that information to self-report under the Leniency Policy.

To view all formatting for this article (eg, tables, footnotes), please access the original <u>here</u>.

Axinn Veltrop & Harkrider LLP - Daniel K. Oakes, James W. Attridge and Tiffany Rider

MHProNews note: see Part II's Saturday 7.12.2025 report for more details and examples of possible ways you, or someone you know, could cash in via the new DOJ Whistleblowers Reward program.

3) But note that the above via Lexology points to another possible development. Look again at what was said above. MHProNews has added bold for emphasis, but the underlying text is the same.

Traditionally, its Leniency Policy — by which those who self-report cartel conduct and meet the program's requirements receive non-prosecution protection — was its core carrot. Now there's another. A new whistleblower rewards program, announced in partnership with the United States Postal Service (USPS), offers the possibility of a financial reward for reporting antitrust conspiracies to fix prices, rig bids, or divide markets. The potential reward is significant: up to 15-30% of resulting criminal fines or recoveries for voluntarily providing the Antitrust Division with original information about antitrust and related violations.

It is quite possible that someone/multiple individuals who have long had knowledge of various potential violations of federal law in manufactured housing that includes some aspect of antitrust law violation may have a new incentive to step up SOON. Why? Because the **longer standing leniency policy combined** with the "new whistleblower rewards program" can put a kind of time clock to be 'first' to report.

MHProNews can't offer legal advice but can offer practical observations via reports that are laced with legally and otherwise accurate information. It can now pay to know. Take the time to read, or read twice for clarity, the various articles on this topic. Why? Because as Copilot observed and is quoted in the Saturday 7.12.2025 report and/or in the Patch teaser to it, how the complaint is expressed (how it is 'framed') can make a difference. Some attorneys may accept a client on contingency in order to help them properly explain the evidence and claim to DOJ. Those who may be involved in such a conspiracy in the manufactured housing industry may not need a contingency attorney.

4) Shifting gears but still possibly related (say for a current or former staffer at MHI and/or an MHI linked state association). Another exclusive this week found in Part II is the following table packed with related insights.

21st Century HUD Secretaries: Statements or Actions on Manufactured Housing. In several respects this may strike near the heart of "regulatory capture" that is part of the explanation for why HUD Code manufactured housing is underperforming during the 21st century and a well-documented affordable housing shortage, despite favorable laws that are in part administered by HUD.

Photo	Name	Tenure	Party	y Key Statement or Action	Source
Martínez	Mel Martínez	2001– 2003	R	Rejected MHCC recommendation to enforce enhanced preemption; House Democrats pushed back.	MHARR
<u>Jackson</u>	Alphonso Jackson	2004– 2008	R	Oversaw HUD Code updates and affordability programs; no direct statement found.	HUD Archive

Photo	Name	Tenure	Party	Key Statement or Action	Source
<u>Donovan</u>	Shaun Donovan	2009– 2014	D	"Manufactured housing plays a vital role in meeting the housing needs of the nation"	HUD
<u>Castro</u>	Julián Castro	2014– 2017	D	"Manufactured homes provide a significant resource for affordable home ownership."	<u>MHProNews</u>
<u>Carson</u>	Ben Carson	2017– 2021	R	"Manufactured housing is one of our real priorities HUD is a strong proponent of manufactured housing."	<u>HUD Speech</u>
<u>Fudge</u>	Marcia Fudge	2021– 2024	D	"Until we start to address [zoning barriers] we are going to continue to be perpetually in this kind of situation."	
<u>Todman</u>	Adrianne Todman (Acting)	2024	D	"We continue the progress by boosting the supply and affordability of manufactured homes."	<u>Senate Banking</u> <u>PDF</u>
<u>Turner</u>	Scott Turner	2025– present	R	"Manufactured homes are built by wisdom simpler, more cost effective, and ultimately, more accessible."	<u>MHI</u>

There is much more to know. For those who may be working in the manufactured home industry, or who have knowledge or evidence of antitrust violations that may or may not be combined with other violations of the law, see the Saturday report. You will likely need to have a good understanding of how the new Whistleblowers program works and why the Department of Justice (DOJ) should be looking into manufactured housing in order to file a successful claim. Knowledge is potential power. Take the time to REALLY understand the issues. While many may be able to provide tips that doesn't mean that many will provide tips to federal officials.

It can pay to be in the know. Then Whistleblowing you can go.

5) Food for thought. In 2022, MHProNews reported that it had been in touch (contacted) with multiple attorneys who had been reading article(s) on MHProNews. Based on information from such conversations, MHProNews predicted that serious legal action by attorneys acting on behalf of potential victims within manufactured housing appeared to be on the horizon. The next year, multiple antitrust law suits were filed on behalf of residents in land lease communities that were often linked to so called 'predatory' members of MHI. Keep Fred Neil's words in mind.

But also keep in mind that you or some retailer or producer, past or present, in MHVille is likely also a victim of antitrust violations, in the expert view of this writer for MHProNews. See the Saturday 7.12.2025 Patch report below for an example. If you, or someone you know, that was in the business around 2009, **you may have or recall evidence** of an antitrust violation that arguably damaged manufactured housing's capacity in serious ways.

Part II

Remember. Don't miss today's postscript.

With no further adieu, here are the headlines for the week in review from 7.6 to 7.13.2025

What's New, Recent and Select from MHLivingNews

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https://www.manufacturedhomelivingnews.com/manufactured-home-community-a-k-a-

<u>mobile-home-park-residents-pressured-by-purported-predators-whos-behind-crisis-who-</u> <u>profits-from-status-quo-and-what-can-be-done-legally-mhville-fea/</u>[/caption][caption id="attachment_216175" align="aligncenter" width="600"]



https://www.manufacturedhomelivingnews.com/affordable-housing-manufacturedhomes-and-the-rigged-system-what-every-american-should-know-and-why-truth-seekinghybrid-journalism-matters-eye-opening-mhville-facts-evidence-analysisfea/[/caption][caption id="attachment_215488" align="aligncenter" width="600"]



<u>https://www.manufacturedhomelivingnews.com/understanding-mhis-lingo-on-attainable-</u> <u>vs-affordable-per-manufactured-housing-institute-they-are-elevating-housing-innovation-</u> <u>expanding-attainable-homeownership/</u>[/caption][caption id="attachment_214838"

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https://www.manufacturedhomelivingnews.com/artificial-intelligence-with-human-expertis-hybrid-journalism-u-s-affordable-housing-crisis-often-misunderstood-to-clarify-issueshuman-expertise-and-ai-boosted-fact-checks-of-mhi-and-mharr/ [/caption][caption id="attachment_214526" align="aligncenter" width="600"]



https://www.manufacturedhomelivingnews.com/consumer-alerts-gemini-on-are-warrenbuffett-style-moats-harming-affordable-housing-seekers-and-some-community-residentsclayton-21st-champion-sky-cavco-cvco-mhi-linked-community-owners[/caption][caption id="attachment_213858" align="aligncenter" width="600"]



<u>https://www.manufacturedhomelivingnews.com/the-story-that-the-manufactured-</u> <u>housing-institutes-mhi-news-dept-and-their-industry-allies-routinely-ignore-mobile-home-</u> <u>issue-voted-down-by-zoning-board-afford/</u>[/caption][caption id="attachment_211962" align="aligncenter" width="600"]



https://www.manufacturedhomelivingnews.com/fannie-mae-research-reveals-whatsdriving-the-increasing-importance-consumers-place-on-their-homes-what-that-researchcould-mean-for-affordable-housing-and-manufactured-home-seekersres/[/caption][caption id="attachment_211004" align="aligncenter" width="600"]



https://www.manufacturedhomelivingnews.com/revisiting-pamela-blumenthal-andregina-gray-hud-edge-report-opportunities-to-increase-housing-production-andpreservation-plus-star-parker-hud-sec-turner-with-facts-and-mhville-analysis/[/caption]

What's New, Recent, and Select from Washington, D.C. based MHARR

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https://manufacturedhousingassociationregulatoryreform.org/manufactured-housingassociation-for-regulatory-reform-mharr-july-9-2025-washington-update-an-exclusive<u>report-and-analysis/</u>[/caption][caption id="attachment_216861" align="aligncenter" width="600"]



https://manufacturedhousingassociationregulatoryreform.org/manufactured-housingproduction-falls-slightly-in-may-2025-per-official-data-provided-by-manufacturedhousing-association-for-regulatory-reform/[/caption][caption id="attachment_216862" align="aligncenter" width="600"]

DOE Issues Final Rule Delaying Energy Rule Compliance Date for "Tier 2" Manufactured Homes –





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https://manufacturedhousingassociationregulatoryreform.org/mharr-addressesdeficiencies-and-concerns-and-submits-proposals-to-congress-to-correct-pendinghousing-supply-frameworks-act/[/caption][caption id="attachment_215738" align="aligncenter" width="600"]



<u>https://manufacturedhousingassociationregulatoryreform.org/mharr-issues-proposed-</u> modifications-to-pending-and-potential-legislation-impacting-manufactured-<u>housing/</u>[/caption][caption id="attachment_215490" align="aligncenter" width="600"]



Manufactured Housing Industry Production Rises in April 2025 per Official Data Collected for HUD According to the Manufactured Housing Association for Regulatory Reform (MHARR)

https://manufacturedhousingassociationregulatoryreform.org/manufactured-housingindustry-production-rises-in-april-2025-per-official-data-collected-for-hud-according-tothe-manufactured-housing-association-for-regulatory-reform-mharr/[/caption][caption id="attachment_215806" align="aligncenter" width="600"]



https://manufacturedhousingassociationregulatoryreform.org/mharr-continues-toaddress-critical-manufactured-housing-industry-issues-draft-manufactured-housing-billscould-have-serious-repercussions-if-not-addressed-and-corrected-properly/ [/caption][caption id="attachment_215166" align="aligncenter" width="600"]



https://manufacturedhousingassociationregulatoryreform.org/mharr-reveals-position-on-3-pending-bills-in-congress-impacting-manufactured-housing-plus-announces-foia-ofteresa-payne-related-hud-records/[/caption][caption id="attachment_214527" align="aligncenter" width="600"]



https://manufacturedhousingassociationregulatoryreform.org/seeking-the-alignment-ofthe-manufactured-housing-industry-with-president-trump-and-hud-secretary-scottturner-vision-of-affordable-homeownership-danny-ghorbani-qa-ex-mhi-vp-exceo/[/caption][caption id="attachment_213366" align="aligncenter" width="600"]



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<u>https://manufacturedhousingassociationregulatoryreform.org/manufactured-housing-</u> <u>association-for-regulatory-reform-mharr-leaders-call-on-hud-secretary-to-address-and-</u> <u>remedy-federal-manufactured-housing-program-mismanagement/</u>[/caption][caption id="attachment_181315" align="aligncenter" width="600"]



MHARR White Paper Exposes Exploitation Notwithstanding Continuing Industry Failures

https://manufacturedhousingassociationregulatoryreform.org/mharr-white-paperexposes-public-relations-exploitation-notwithstanding-continuing-industryfailures/[/caption][caption id="attachment_142511" align="aligncenter" width="606"]



https://manufacturedhousingassociationregulatoryreform.org/mharr-releases-studyrecommending-independent-collective-representation-for-post-productionsector/[/caption]

What's Recent or Select from the Masthead

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https://www.manufacturedhomepronews.com/masthead/terminology-101-understandkey-words-palter-posture-projecting-optics-regulatory-capture-iron-triangle-nonprofitcapture-illusory-truth-how-throttling-productionconsolidation-moat/[/caption]



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What's the Latest from Tim Connors, CSP and his Words of Wisdom

Note: all third-party views are their own. *MHProNews* presents thought-provoking items to get the mental juices flowing. Connor's columns weave potent quotes with a unique blend of thoughtful comments and analysis, but they are his views.

[caption id="attachment_173358" align="aligncenter" width="601"]



https://www.manufacturedhomepronews.com/wordsofwisdom/do-not-blame-anybodyfor-your-mistakes-or-failures/[/caption]

[caption id="attachment_173149" align="aligncenter" width="608"]



https://www.manufacturedhomepronews.com/wordsofwisdom/what-is-the-true-love/ [/caption]

[caption id="attachment_172954" align="aligncenter" width="621"]



https://www.manufacturedhomepronews.com/wordsofwisdom/do-not-be-afraid/ [/caption]

[caption id="attachment_173150" align="aligncenter" width="602"]



https://www.manufacturedhomepronews.com/wordsofwisdom/meaning-of-life/[/caption]

What's New in the more eclectic smorgasbord of topics from contributor L. A. "Tony" Kovach in the "<u>Reality Check</u>" series for the mainstream <u>Patch</u> [caption id="attachment_217178" align="aligncenter" width="602"]



https://patch.com/florida/lakeland/could-letter-you-received-months-or-years-ago-nowearn-you-big-doj-whistleblower[/caption][caption id="attachment_217179" align="aligncenter" width="609"]



https://patch.com/florida/lakeland/stephen-moore-weighs-antitrust-policy-hits-misseshis-course-correction-antitrust [/caption][caption id="attachment_217096" align="aligncenter" width="600"]



https://patch.com/florida/lakeland/mharr-provides-washington-d-c-updates-affordablemanufactured-housing-bills[/caption]

MHProNews states the obvious by noting that there are no known working crystal balls. That said, our articles here, on *MHLivingNews*, or on the mainstream Patch are written to stand the test of time. The article below - along with others - was fact-checked by AI for leftright balance and other factually accurate and logically sound analysis.



[caption id="attachment_217180" align="aligncenter" width="602"]

https://patch.com/florida/lakeland/what-big-beautiful-bill-now-federal-law-what-variousgroups-media-said-plus-epste[/caption][caption id="attachment_217181" align="aligncenter" width="610"]



https://patch.com/florida/lakeland/katelynn-richardson-conservative-churches-winmassive-concession-court-case-against [/caption][caption id="attachment_217183" align="aligncenter" width="605"]



https://patch.com/florida/lakeland/gigo-important-understanding-computers-searchresults-ai-plus-human-understanding[/caption][caption id="attachment_217184" align="aligncenter" width="603"]



https://patch.com/florida/lakeland/even-ai-admits-artificial-intelligence-poses-dystopianrisk-humanity-truth-faith[/caption][caption id="attachment_217185" align="aligncenter" width="608"]



<u>https://patch.com/florida/lakeland/tech-advancing-living-standards-how-govt-can-boost-incomes-conv-manufactured-home[/caption]</u>

What's New on the Daily Business News on MHProNews

Saturday 7.12.2025
[caption id="attachment_217156" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/new-doj-antitrust-whistleblower-rewardsprogram-create-pipeline-of-leads-from-people-with-firsthand-knowledge-of-criminalantitrust-and-related-offenses-per-ast-ag-gail-slater-mhvil/[/caption]

Friday 7.11.2025

[caption id="attachment_217081" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/battle-over-the-fed-and-interest-rates-

omb-memo-is-apparent-tip-of-the-spear-for-president-trump-vs-jerome-powellconventional-manufactured-housing-concerns-mhville-facts-evidence-analysis/[/caption]

Thursday 7.10.2025

[caption id="attachment_217058" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/manufactured-housing-association-forregulatory-reform-mharr-july-2025-washington-update-an-exclusive-report-and-analysisplus-manufactured-housing-institute-news-unpacked-with-mhville-fea/[/caption]

Wednesday 7.9.2025

[caption id="attachment_217016" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/exclusive-statements-or-actions-21stcentury-hud-secretaries-on-manufactured-housing-npr-surprise-announcement-by-irs-incourt-document-filed-monday-mhville-opportunity-in-disguise-mhville-fea/[/caption]

Tuesday 7.8.2025

[caption id="attachment_216974" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/council-president-fred-neil-land-lease-is-

<u>dead-as-affordable-housing-gamble-guarantees-only-the-landlord-wins-manufactured-homeowner-resident-vol-on-rhp-prop-mhc-consolidators-mhvi/[/caption]</u>

Monday 7.7.2025

[caption id="attachment_216926" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/montauk-shores-mobile-home-stigmaand-affordable-housing-trailer-houses-or-manufactured-housing-often-associated-withhousing-for-poor-middle-class-or-rich-wont-consider-debunked/[/caption]

Sunday 7.6.2025



[caption id="attachment_216897" align="aligncenter" width="600"]

https://www.manufacturedhomepronews.com/caution-flag-mharr-says-manufacturedhousing-production-falls-slightly-in-may-2025-but-over-half-of-top-10-shipment-stateslag-2024-mhis-statement-sunday-weekly-mhville-h/[/caption]

Postscript

1) Copilot described this inquiry as 'mapping the edges of the new whistleblowers reward program.' The following Q&A with Copilot included the inquiry from *MHProNews* as shown, with the response from <u>Bing</u>'s AI powered Copilot.

Copilot, under this new DOJ whistleblower rewards program, hypothetically, if a federal and/or state official has knowledge of activity (say knowledge that points to an example of regulatory capture at HUD, FHFA, DOE, or other agencies) is there any reason that a public official that can check the correct boxes to meet the requirements couldn't also potentially get a reward?

Great question, L., and you're thinking exactly like someone who's mapping the edges of this new DOJ program. Based on the DOJ's **Memorandum of Understanding** (**MOU**) and legal commentary, here's how it breaks down:

Can Public Officials Qualify for DOJ Whistleblower Rewards?

In most cases, **no** — **federal and state officials are generally excluded** from receiving whistleblower rewards under this program. Specifically:

- The MOU explicitly deems ineligible:
- Officials, employees, and contractors of the DOJ
- Postal Service personnel
- Law enforcement agency employees
- Certain relatives of the above groups

This exclusion is designed to prevent conflicts of interest and ensure that those with **legal** or ethical duties to report misconduct aren't financially incentivized to do so.

What About State-Level Officials or Agency Staff (e.g., HUD, FHFA, DOE)?

If the individual is:

- Not employed by DOJ, USPS, or law enforcement
- Not acting in an official capacity
- Not obligated to report the misconduct as part of their job
- And the information is original, non-public, and voluntarily submitted

Then yes — they may be eligible, especially if they're:

- A former official
- A contractor or consultant without reporting obligations
- A whistleblower acting outside their formal role

But if they're currently employed in a role where reporting is **legally required**, or if they obtained the information through **compliance**, **audit**, **or privileged channels**, they're likely **ineligible**.

What If the Tip Involves Regulatory Capture at HUD, FHFA, or DOE?

If a whistleblower — even a public official — can show:

- Antitrust violations (e.g., collusion, bid rigging, monopolization)
- That the conduct affects USPS revenues, property, or operations
- And they submit original, voluntary, and credible evidence

Then the tip could qualify. But the whistleblower must **not be barred by role-based exclusions** in the MOU.

🚫 Bottom Line

- Current DOJ, USPS, and law enforcement officials are excluded.
- Other federal or state officials may be eligible if they're not obligated to report and meet all other criteria.
- Former officials, contractors, or insiders with firsthand knowledge of regulatory capture or collusion could be strong candidates especially if USPS was used to facilitate the scheme.

Would you like help drafting a hypothetical whistleblower profile that fits within these eligibility boundaries? I can sketch one out that aligns with the DOJ's framework.

--- MHProNews notes that the cut and paste from Copilot into the publishing software used by MHProNews doesn't apparently support Copilot's footnotes. Thus those footnotes are edited in manually to make for a complete and accurate record for readers and researchers. ---

- 1) https://natlawreview.com/article/new-doj-antitrust-postal-whistleblowerrewards-program-look-under-shiny-hood
- 2) https://www.antitrustlawblog.com/2025/07/articles/criminal-doj/new-dojantitrust-postal-whistleblower-rewards-program-a-look-under-the-shiny-hood/

--- MHProNews notes that the screen capture documenting the accuracy of the above is as posted below. ---

2) The follow up Q&A with MHProNews and Copilot.

Sure. But it might be useful to do profiles from various segments from within the industry, say from producers or retailers that may have specific knowledge of the purported 21st Mortgage "tying" letter from 2009 or similar evidence of an antitrust violation that used the U.S. mail, plus an example from the communities sector that fits, and then another example that you may have already had 'in mind,' so to speak.

Absolutely, L.—here's a trio of **hypothetical whistleblower profiles** tailored to the DOJ's Antitrust Whistleblower Rewards Program, each grounded in real-world dynamics and designed to meet the USPS nexus requirement.

1. Retailer or Producer Insider: The "Tying Letter" Witness

Profile:

A former manufactured home retailer who operated independently in the late 2000s and early 2010s. They received the **2009 "tying" letter** from 21st Mortgage Corporation, which threatened to cut off financing unless they agreed not to sell homes from certain producers.

Key Evidence:

- A copy of the letter (even without the envelope), showing coercive language
- A notarized affidavit confirming USPS delivery
- Internal communications showing **retaliation or business loss** following refusal to comply
- Knowledge of **other retailers** who received similar letters and were forced out of business

USPS Nexus:

- The letter was reportedly sent via U.S. Mail and fax
- The USPS was used to **distribute coercive communications** that enforced a tying arrangement
- The mailing was part of a **scheme to suppress competition**, potentially qualifying under the DOJ's criteria

Reward Potential:

• If the DOJ investigates and imposes a fine of **\$1 million or more**, the whistleblower could receive **15–30% of the recovered amount**

2. Community Sector Insider: The Rent Hike Enforcer

Profile:

A former regional manager at a land-lease community operator (e.g., ELS, Sun

Communities, YES! Communities) who oversaw rent increase notices sent to residents. They were instructed to use **Datacomp's JLT Market Reports** to justify rent hikes and mail notices via USPS.

Key Evidence:

- Internal memos showing collusive pricing strategies
- Copies of **rent hike notices** sent via USPS
- Emails confirming use of Datacomp data to coordinate pricing
- Testimony that USPS was the **standard channel** for delivering these notices

USPS Nexus:

- USPS was used to implement the price-fixing scheme
- The mailings directly impacted **consumers**, especially elderly and low-income residents
- The scheme may have **generated revenue** traceable to USPS-facilitated communications

Reward Potential:

• If the DOJ finds the scheme violated antitrust laws and used USPS infrastructure, the whistleblower could qualify for a payout

🧐 💼 3. Former Trade Group Affiliate or Consultant: The Collusion Mapper

Profile:

A former consultant or board member affiliated with the Manufactured Housing Institute (MHI) or a state-level affiliate. They attended meetings where **exclusionary tactics**, **refusals to deal**, and **strategic throttling of production** were discussed. They also witnessed USPS being used to distribute **policy memos**, **membership directives**, or **coordinated lobbying materials**.

Key Evidence:

- Meeting notes or recordings showing anticompetitive intent
- Copies of mailings sent via USPS to members enforcing collusive practices
- Documentation of retaliation against dissenters

• Insights into how MHI-linked firms coordinated zoning, financing, and trade access

USPS Nexus:

- USPS was used to disseminate collusive strategies
- The mailings may have impacted market access, financing, or regulatory capture
- The whistleblower can show USPS was instrumental in executing the scheme

Reward Potential:

• If the DOJ confirms the scheme and its USPS connection, this insider could be a **high-value whistleblower**

Would you like help drafting sample affidavits or whistleblower narratives based on these profiles? I can also help map out how each could be presented to DOJ investigators in a compelling, legally sound format.

3) If someone is going to use AI to help draft a commentary, it may be wise to have several articles in mind from MHProNews/MHLivingNews and the MHARR website that shed light on facts and insights that can help 'frame' an argument that would be compelling to antitrust investigators. After two plus years of using AI on a near-daily basis, it is the view of MHProNews that how the input is worded and what evidence or insights can be provided for AI to digest to give it a sense of direction is important, perhaps even critical to getting the best possible output and thus outcome.

4) Earlier this year, MHProNews spotlighted a commentary by Elizabeth Nickson. Nickson has reflected on her own journey in media.

Twenty years a fool: My long journey home from the left

Elizabeth Nickson's story has all the makings of a Hollywood bio pic: A Westmount exile, who rebels against power and privilege, becomes a globe-trotting leftist journalist chronicling the great revolutionary narratives of her time. Then she sets out to discover the awful truth about her patriarchal 400-year-old colonist clan and everything changes. But Hollywood won't touch her script because what she finds are eternal truths, about love, charity, sacrifice, Christianity and genuine freedom.

[caption id="attachment_211353" align="aligncenter" width="540"]

Politics & Government

THE Reality Check-All of Us Have Been Manipulated & Lied to-E. Nickson

\$4.7 Trillion Dollars in Ripoffs May Be Tip of the Iceberg-Every American Should Want to Know the Truth-Insights by Elizabeth Nickson & More



L. A. "Tony" Kovach, Community Contributor

Posted Tue, Feb 25, 2025 at 11:13 am ET | 9



Image credits for Elizabeth Nickson's photo is her Welcome to Absurdistan Substack. Text and collage credits to this writer for MHProNews and this Patch.

https://patch.com/florida/lakeland/reality-check-all-us-have-been-manipulated-lied-enickson [/caption]

5) Nickson wrapped the left in her commentary, sharing specific examples of her 'progressive' bona fides in an apparent attempt to connect with those who may still be in that camp. In one of the recent Patch commentaries, *MHProNews'* Kovach wrapped Stephen Moore, an adviser to President Trump during his first term in the White House. Moore is considered to be from the political right. So, those two articles are examples of how personalities and stances on both sides of the left-right divide are subject to evidencebased critiques in a steady search for what is factually accurate, evidence based, and thus as close to 'true' as may be possible in a time when misinformation or spin (that can come from left or right) is all too common. Governments and big companies routinely have access to 'intelligence' and information that may not be as readily available to employees, smaller businesses, retirees, students, or others. Rather than merely curse the darkness, *MHProNews* has long shared the wise insight observed by Elenor Roosevelt and the Christophers. Namely, it is better to light one candle than it is to curse the darkness.

As *MHProNews* has noted for years, actor Danny Glover in the context of the groundbreaking, still relevant, and award-winning *Shadows of Liberty* keenly observed that there is not only a monopoly of wealth but also a monopoly of information as well. Glover is from the left. Quoting him (or anyone else) doesn't imply an endorsement of all that a person said or has done. In the case of such pull quotes it is the quote itself that is keenly timely in a wide array of circumstances.



[caption id="attachment_176694" align="aligncenter" width="598"]

Quote from the full length and award-winning **"Shadows of Liberty**" documentary drama. **Shadows exposed several aspects of the political, media, corporate, and regulatory nexus by interviewing insiders involved in it**. It explores examples from left and right with the impact of money and information manipulation. Glover has served on a Warren Buffett funded board. https://www.manufacturedhomepronews.com/danny-glover-andrevealing-manufactured-housing-realities-power-of-correct-questions-andobservations-regardless-of-good-bad-laughable-or-no-reply-plus-sundaymanufactured-home-weekly-r/ See the Illusory Effect updates linked here: https://www.manufacturedhomepronews.com/when-the-lies-are-so-big-no-one-would-

<u>dare-disbelieve-them-mainstream-legacy-or-alternative-media-u-s-public-policies-</u> <u>illusory-truth-and-manufactured-housing-plus-mhville-mark/[</u>/caption]

6) How is it possible that sometimes big scams can operate successfully for years or even decades? The answer comes in part by understanding what Glover said and its implications for our circumstances and times. Glover reportedly served for years on a Warren Buffett non-profit board. Glover's insights are relevant, regardless of politics.

To solve a problem, someone must first consider the challenge as objectively as possible. The late and long popular speaker and author Zig Ziglar put it well.



[caption id="attachment_83998" align="aligncenter" width="600"]

"The first step in solving a problem is to recognize that it does exist.

Next, we determine whether the problem is our responsibility. If the answer is yes, we must determine how serious and/or urgent it is.

When that last determination is made, we either:

take immediate action if the problem is simple

and quickly solvable,

 or develop a plan of action and prioritize it if the solution is more difficult and time-consuming.

Problem-solving becomes a very important part of our makeup as we grow into maturity or move up the corporate ladder..."



https://www.manufacturedhomepronews.com/masthead/dont-zag-zig-business-ownersmanagers-investors-discover-superior-way-to-do-manufactured-housing-excellence-inmanufactured-home-consumer-professional-experience/[/caption]

Ziglar and Theodore Tuttle are credited with this keen insight.





https://www.manufacturedhomepronews.com/masthead/dont-zag-zig-business-ownersmanagers-investors-discover-superior-way-to-do-manufactured-housing-excellence-inmanufactured-home-consumer-professional-experience/[/caption]

7) It isn't rocket science, as the Florida Manufactured Housing Association's (FMHA) Executive Director Jim Ayotte correctly mused. That article below was first uploaded on August 19, 2021 and is arguably as relevant today as it is now...perhaps more so. [caption id="attachment_172844" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/masthead/not-rocket-science-after-flakfmha-ayotte-attack-exposes-tim-williams-21st-kevin-clayton-joe-stegmayer-cavcomanufactured-housing-institute-mhi-ridiculous/[/caption]

8) If the Manufactured Housing Institute (MHI) was sincerely trying to advance the industry to the 300,000 to nearly 1 million new homes annually various MHI-linked figures have said is possible in the 21st century, then it is those MHI leader's own words that are de facto calling for a plausible explanation as to why the industry is still stuck at around 100,000 (+/-) new homes a year. There is an obvious need to understand why the industry is smaller today than it was in the years that Warren Buffett led Berkshire Hathaway dived in by first taking a large stake in Oakwood Homes (2002) and then buying Clayton Homes the next year (2003). Kevin Clayton clearly said that Buffett told him he could access whatever resources he needs in support of their work.

[caption id="attachment_192482" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/warren-buffett-apparently-has-eye-onnew-double-wide-marketwatch-fast-company-reports-on-clayton-homes-and-relatedmanufactured-housing-acquisitions-plus-sunday-weekly-mhville-headl/ [/caption]

[caption id="attachment_184964" align="aligncenter" width="600"]



WARREN BUFFETT'S YOU CAN ACCESS PLEDGE TO FUNCTION - Transcript, and Implications for Manufactured Housing Industry

https://www.manufacturedhomepronews.com/warren-buffetts-pledge-to-kevin-claytonyou-can-access-plenty-of-capital-for-projects-quotes-facts-video-transcript-andimplications-for-manufactured-housing/ [/caption][caption id="attachment_216705"

align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/berkshire-hathaway-brk-linked-berkadiaresearch-into-land-lease-manufactured-home-communities-market-data-trends-pluslending-options-increase-for-manufactured-housing-market-mhville-fe/[/caption]

9) When someone realizes that Buffett literally had *a relative* in the Obama-Biden White House, and that the Duty to Serve (DTS) manufactured housing from HERA 2008, the 2000 Reform Law (a.k.a.: Manufactured Housing Improvement Act of 2000) were not getting properly implemented with that kind of access, objective thinkers willing to look closely at evidence ought to lean in.



[caption id="attachment_127403" align="aligncenter" width="575"]

uploaded by MHProNews on December 21, 2018. [/caption]

10) Given that Warren Buffett, his close ally William "Bill" Gates III have apparent ties to Clayton Homes, 21st Mortgage Corporation, Vanderbilt Mortgage and Finance (VMF), and Berkadia (among others, like Shaw, Iowa Reality, etc.) that are obviously involved in aspects of manufactured housing, it would be trade journalistic malpractice to ignore such obvious connections. As the late Senator William Proxmire (WI-D) keenly noted, 'there are no coincidences in Washington, D.C.' and "follow the money" trail.



[caption id="attachment_155766" align="aligncenter" width="600"]



https://www.manufacturedhomelivingnews.com/warren-buffetts-moat-per-kevin-claytonceo-clayton-homes-interview-transcript-video-affordable-housing-and-manufacturedhomes/[/caption][caption id="attachment_154194" align="aligncenter" width="572"]



Kevin Clayton, left, Warren Buffett, right.

Photo credit:



"Warren [Buffett] is very competitive ...he paints such an image in each of our manager's minds about this moat, this competitive moat, and our job is very simple and we share this...

Deepen and widen your moat to keep out the competition...

But some of our competitors do a good job, but our plans are to make that difficult for them."

Kevin Clayton,
President and CEO of Clayton Homes,
a Berkshire Hathaway brand.
Source – video transcript posted on
MHLivingNews.com.

https://www.manufacturedhomelivingnews.com/warren-buffetts-moat-per-kevin-claytonceo-clayton-homes-interview-transcript-video-affordable-housing-and-manufacturedhomes/[/caption][caption id="attachment_152732" align="aligncenter" width="609"] "This isn't the first time Buffett's love of moats has been attacked. Berkshire Hathaway has been criticized for its business practices, which seemed to put profit over customers, particularly at its Clayton Homes division."

Rupert Hargreaves
GuruFocus - May 15, 2018.

Warren Buffett Can't Escape Unethical Strategic 'Moats'



Not all moats live up to Buffett's folksy image

These examples that span the left, right, independent, etc. niches reflect reality. Reality, not fables or nice sounding narratives, are what people operate in. Guru Focus is in many ways pro-Buffett, but in the quote above, Rupert Hargreaves slammed Buffett's use of moat tactics at Clayton Homes, which in the Berkshire Hathaway organization is where 21st Mortgage and VMF are located. [/caption][caption id="attachment_157760"

align="aligncenter" width="600"]



This statement is revealing. **A parasite feeds on its host.** Bill Gates admits he thought ill of Warren Buffett. But they got together on numerous business, nonprofit, and political levels. Clearly, whatever held Gates back he overcame. What he didn't claim in this quote is that Buffett changed. There is an inference that Gates learned from Buffett and embraced that parasitic business model. It must be recalled that Microsoft was deemed to be a monopolist in a federal antitrust case. [/caption]

11) The reason that the DOJ is offering financial rewards that can lead to successful antitrust action is precisely because it can be difficult to prove a case without insiders. See that deep dive report linked above, <u>here</u> and as was cited in Part I of today's report.

So, Copilot, as you may realize, it is now Sunday and time for a Sunday Weekly Headlines review/recap. Create a featured image that illustrates this: Mobile and Manufactured Home Residents and Staff in Predatory MHC Managed Properties Can CA\$H IN With Whistleblower Tip\$ 'Hell of a Job' plus Sunday Weekly MHVille Headlines in Review with FEA. The 'Hell of a job' remark was an on the record statement by Dover Council President Fred Neil to MHProNews on the report that included him last week. Neil is a 91 year old manufactured home owner and a resident in a 'predatory' community operator's land lease.



Your featured image is in motion — expect symbolic visuals of manufactured home residents and staff in predatory settings, nods to whistleblower rewards, and a creative wink to Dover's Fred Neil and his "hell of a job" praise. It'll pair perfectly with your Sunday recap.





Nice! I'll crop off the top, as it is incomplete (running off the visible image), but will use the balance. More soon, thx.

🥼 Copilot

Glad it worked for your layout, L.—that kind of creative repurposing is what hybrid journalism thrives on. If you want a modified version that fits your cropping needs or a companion graphic for outreach or social, I can whip that up. Always ready to amplify the story.

This is how the edited version of that image is used by MHProNews.



[caption id="attachment_217193" align="aligncenter" width="600"]

Fred Neil said "<u>Hell of a Job" about the quality of the deep dive report linked here</u>. Neil is an over 20-year manufactured homeowner and resident in a land lease community operated by MHI member RHP Properties. Neil advocates for reforms on behalf of the interests of residents in so-called 'predatory' operator communities. Neil is at this time an elected official and president of the Dover City Council. [/caption] 12)

13)