

## **WUSF 'Even Manufactured Homes Are Becoming Unaffordable;' Executive Summary of Woes Impacting HUD Code Manufactured Housing Revealing Apparent Oligopoly Style Monopolization; MHVille FEA**

On July 30, 2025 at 5:00 AM EDT [WUSF](#) published a news item under the headline: "**When even manufactured housing becomes unaffordable.**" That article was picked up by [several media outlets](#). WUSF said in part: "**Homeowners in Florida are being quietly priced out of their communities.** People often own their manufactured homes but rent the lot underneath them. Census data shows lot rent in the state has nearly doubled over the last decade." One of the illustrations from that article is provided below. What follows in Part I and Part II are two communications. The first is to a Florida state lawmakers office. The second is to the Florida Attorney General's (AG) office. Those two communications provide what is in effect an executive summary of issues that have been plaguing the public and manufactured housing industry sector for some 2 decades. Part III provides additional information with more MHVille facts-evidence-analysis (FEA), including, but not limited to the 'read hot' (red hot) IRS complaint letter filed against the Manufactured Housing Institute (MHI). That letter was provided to the FL AG's office, as will be shown below.

Some of the names are withheld, but the content mirrors what was provided to the parties as noted below.

### **Part I -**

1) *MHProNews* notes that third-party content is provided under [fair use guidelines](#) for [media](#). The images have been adapted to fit this page format, but are the same images provided to the sources as shown. The [typos](#) below are in the original.

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Ranay,

As you may have noticed in the last week, the item linked below by WUSF has been picked up by Polk County area news platforms. The implication is that those platforms find it relevant to their audiences.



Heatwaves +

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## Top Haines City News



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### Even manufactured homes are becoming unaffordable

Judy Schofield chokes back tears thinking about the memories she made here with her late husband. From her living room couch, where she sits now, she admires...

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📍 Polk County, Florida

## Even manufactured homes are becoming unaffordable

By Gabriella Paul - WUSF, 12 days ago

Free local news and info, in your inbox at 6 a.m. M-F. Judy Schofield chokes back tears thinking about the memories she made here wit...



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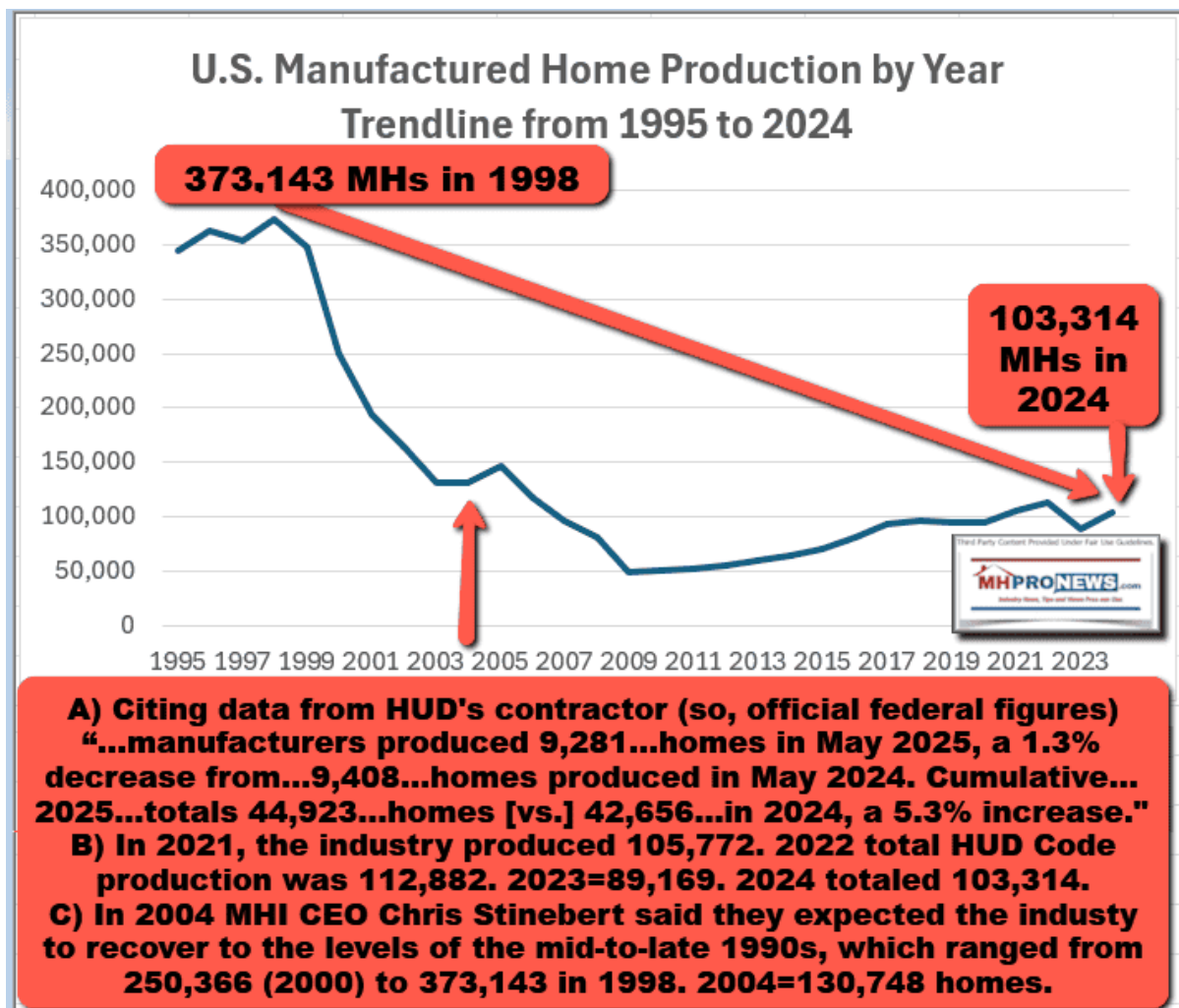
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Jul 30, 2025 — Judy Schofield chokes back tears thinking about the memories she made here with her late husband. From her living room couch, where she sits ...

Ranay, while much of that report is okay, it lacks a fuller presentation (perhaps due to a lack of understanding, perhaps due to agenda, that is speculative) of the law and possible swifter solutions based upon enforcing existing laws. That said, it does produce some useful insights.

For example.

I find the start date of this chart above to be fascinating. Because 2009-2010 was the 'bottom' of the 21st century manufactured home production levels. More on this shortly.



Florida is the #2 state in the U.S. for manufactured home shipments. But FL has been trailing its shipments year to date as the next graphic illustrates. I added the highlighting for a report we've published, but the data is per the [Manufactured Housing Association for Regulatory Reform](#) (MHARR).



<u>Rank</u>	<u>State</u>	<u>Current Month (June 2025)</u>	<u>Cumulative</u>	<u>2025</u>	<u>2024</u>
1.	Texas	1,508	42,729	9,293	9,258
2.	Florida	518	18,088	3,321	3,899
3.	N.C.	537	15,228	3,306	3,351
4.	Alabama	412	14,072	2,831	2,977
5.	S.C.	430	12,294	2,820	2,633
6.	Louisiana	409	11,795	2,563	2,642
7.	Georgia	429	11,001	2,525	2,284
8.	Tennessee	310	9,064	2,025	2,012
9.	Mississippi	312	9,032	2,127	2,010
10.	Kentucky	312	9,011	1,899	2,018

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With the above in mind, Berkadia said this recently.

**BERKADIA**

## **MANUFACTURED HOUSING INSIGHTS**

JUNE 2025 | BERKADIA RESEARCH



“For households, manufactured homes have appreciated faster than site-built homes, according to a study by HUD and the U.S. Census Bureau. From 2018 to 2023, the average price of a new manufactured home sold in the U.S. increased 58.3% compared to 37.7% for site-built homes.”



That sharper spike in costs for leasing a manufactured home community site and the sharper spike in increased costs to buy a new manufactured home are arguably caused by oligopoly style monopolization. I've asked different AI systems to analyze that and they have concurred it is a classic outcome from market concentration of power as a result of [consolidation](#). Meaning, **this is an apparent antitrust violation hiding in plain sight.**

Nor is this merely watching the outcomes. There are specific remarks on [consolidation](#) published by various publicly traded companies. There have also been published remarks such as the following. The now late Sam Zell's remarks was during an Equity LifeStyle Properties (ELS) earnings call. ELS has several properties in our area and more in FL more broadly.



**"We like the oligopoly nature of our business."**

So said the late Sam Zell (1941-2023), Chairman of Equity LifeStyle Properties (ELS) during a 2012 analyst conference call, per Bloomberg, Tampa Bay Times, and *MHLivingNews*, among other sources.

Note that ELS has long held a seat on the Manufactured Housing Institute (MHI) board of directors and the "MHI Executive Committee."

Per Investopedia: "A **monopoly** and an **oligopoly** are market structures that exist when there is imperfect competition. A monopoly is when a single company produces goods with no close substitute, while an oligopoly is when a small number of relatively large companies produce similar, but slightly different goods. In both cases, significant barriers to entry prevent other enterprises from competing."



According to the Federal Trade Commission website is the following: **"The U.S. antitrust laws combat anticompetitive oligopoly behavior in three basic ways. ..."**

Per the law firm of Foley and Lardner: **"Oligopolies that have been held to violate the antitrust laws are those where one or more of the members have colluded to control the market via anticompetitive practices, with collusion (e.g., price fixing) being the usual violation."**





Dave Reynolds | Frank Rolfe

**"Sure, it sounds unfair. But there's nothing illegal about it."** *(Note: the accuracy of that statement is debatable, but it is an accurate quotation).*

**"If you like having a monopoly, holding all the cards, knowing the tenants won't move their homes out, never worrying about someone**

**building a new property near you and taking one of the tenant's biggest assets if they default, then you're going to love mobile home parks."**

~ Frank Rolfe, partner of Dave Reynolds, MHI/NCC member and business, and associated in various business deals with several Berkshire Hathaway owned brands. Rolfe and Reynolds are self-declared and apparent partners in Impact Communities, RV Horizons, Mobile Home Univ, the Mobile Home Park Store, etc.

Quoting a source does not imply any endorsement of that person, organization, personal or business ethics, etc. The quote indicates the statement of that party.



Ranay, you both reacted and nodded your heads when I mentioned this in our meeting. Rightly so. It is a local phenomenon, a state issue, and also a national issue.

ELS is one one of the firm's that has been named as a defendant in a national antitrust suit launched on behalf of residents.

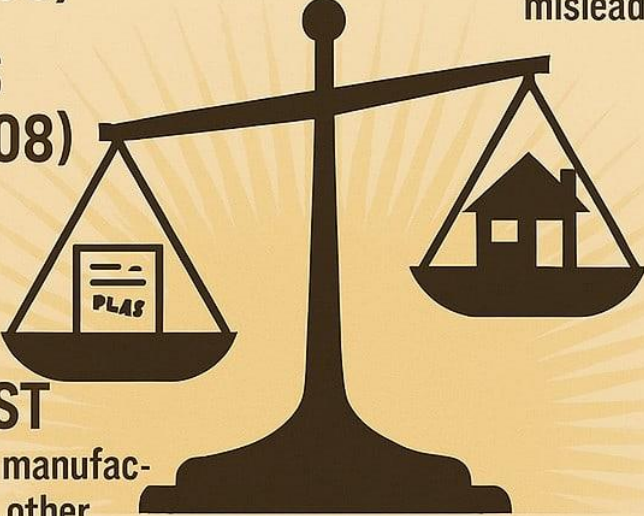
That said, the typical outcome of such suits is a settlement is achieved. It will ultimately be passed onto residents. That's how business works. Whatever the costs, it is passed onto customers.


The only thing that will fix this is returning competition to the marketplace by enforcing existing laws as robustly as possible. The 2000 Reform Law (Manufactured Housing





Improvement Act of 2000) [enhanced preemption](#) provision, the Duty to Serve ([HERA 2008](#)) manufactured housing

# ENFORCE THE LAWS





**MHIA (2000)**


**DTS (2008)**

**ANTITRUST**  
Duty to Serve, manufactured housing, other federally supported financing options


**SECURITIES**  
SEC rules to prevent misleading investors

**RICO**  
Criminal penalties for fraud and collusion

**HOBBS ACT**  
Criminal penalties for extortion or threats



**A) The MHIA is short for the Manufactured Housing Improvement Act of 2000 (a.k.a.: 2000 Reform Law, 2000 Reform Act). B) DTS-Duty to Serve manufactured housing was part of HERA 2008. C) Antitrust laws include Sherman and Clayton Acts.**



I'm again asking that these issues be brought to the attention of state antitrust and other officials. Your office - our elected official's office - could issue a letter asking for such an inquiry.

Let me mention that the [ROAD to Housing Act 2025, which is getting attention in mainstream media, simply won't work](#). There is considerable special interests money behind that bill. It is one more sleight of hand where the *appearance* of action is meant to signal to citizens that federal lawmakers are acting. Lawmakers are acting, but in a way (if successful and if the bill isn't [amended to fix its flaws](#)) because it is a big deal to most Americans.

Seniors are among those most impacted by this. That said, young people are too. The National Association of Realtors (NAR) recently noted that the median age for younger adults buying their first home is at a record high. That's because they can't afford conventional housing, and zoning barriers and uneven financing options (both issues that federal law has addressed, if they would be enforced) are near the root cause.

Should a time come when voters more widely understand these root issues, my hunch is they won't be happy that something wasn't done years ago. I'm hoping that your office will lead on this.

Kindly confirm you have this, advise the status of the thinking there, and thank you.

L. A. "Tony"

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**L. A. "Tony" Kovach**  
**Managing Member**  
**LifeStyle Factory Homes, LLC**

DBAs:

[MHLivingNews.com](#) | [MHProNews.com](#) | [Patch.com/users/Tony-Kovach/articles ...](#)

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Part II - Email to Florida Attorney General's Office on 8.12.2025. Note the message above was a forward to the email below. The attachment mentioned is found at this link [here](#).

from: L. A. Tony Kovach [MHProNews/MHLivingNews]

to: oag---@myfloridalegal.com

date: Aug 12, 2025, 9:37 AM

subject: Complaint over apparent antitrust issue harming seniors, younger adults,  
minorities, and many others

FL AG's office,

I'm the publisher of MHPProNews/MHLivingNews. We are the documented largest and most read trade media serving our industry and we (and I) are Florida based. I spoke with an antitrust office attorney a few years ago. She was very nice, understood my points, but to my knowledge, there was no follow through.

Matters have only gotten worse since then. I'm asking you to investigate.

My time is limited, so I'm forwarding a message I just sent as a follow up to State Senator Collen Burton's assistant Ranay Willis.

Also attached is a formal complaint I recently filed with the IRS. If you look carefully, it provides numerous examples of apparent antitrust violations.

I would be my expert opinion that the Manufactured Housing Institute (MHI) and its state affiliate, the Florida Manufactured Housing Association (FMHA) are being used as tools by [consolidation](#) focused firms. [Samuel Strommen](#), then with Knudson Law, made similar arguments in a 17 page thesis with over 130 references.

[Maris Jensen](#), economist [James A. "Jim" Schmitz Jr and his colleagues](#), Law Professor [Amy Schmitz](#), and others have shed light on aspects of this issue.

There is an evidence-based case to be made that near the root cause of the affordable housing crisis is a nexus of special interests that like the status quo and they want an underproduction of housing so that they can squeeze more out of every customer. It is no surprise that HUD is reporting record homelessness. Higher housing costs that people

can't afford will lead to more homelessness. Again, that's a widely reported link, not mere speculation.

Please see the following. I'm asking YOUR office to please open a formal probe, perhaps impanel a grand jury. [Strommen](#) argued this is criminal antitrust violations.

All of these various sources are useful, but no one besides our publications have bothered to organize the information into a coherent picture so that the cause-effects become clarified.

Kindly confirm you have this. See the forward. The IRS complaint has more details, and the links to reports will have still more. I'm happy to help as much as time makes possible. Thank you.

L. A. "Tony" Kovach

### **Part III - Additional [MHVille Facts-Evidence-Analysis \(FEA\)](#) and MHProNews Commentary**

In no particular order of importance, noting that from this point above, there are some 1360 words, or about 7-8 minutes of typical reading time.

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2)