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Cavco Industries (CVCO) Q1 2026 Earnings Call Transcript-CEO and MHI Chair Bill Boor Says AHS Bid 'Demonstrates Priorities' 'ROAD Act' 'China' plus Communities and ANTITRUST Clues? MHVille FEA



There is an evidence-based case to be made that William C. "Bill" Boor, the president, CEO & a director at publicly traded Cavco Industries, Inc. (NASDAQ:CVCO) and his firm has created competing narratives. One narrative is for investors. Another is for the industry and public. While there may at times appear to be overlaps in these remarks, there are apparent contradictions too that will be explored in Part II of this MHVille facts-evidence-analysis. Part I of this report will include the transcript of the latest Cavco earnings call via [Seeking Alpha](#) (SA), made available below under [fair use guidelines](#) for [media](#). Earnings calls transcripts are relevant to [SEC or other issues related to materiality](#). Earnings calls matter. The remarks by Boor and his colleagues are supposed to be factually accurate at the time those remarks were made.

Due in good measure to remarks made by Bill Boor, this report may be one of the more revealing on the subject of **cautionary or red flags** regarding what appears to be ongoing antitrust violations that involve Cavco Industries (CVCO) along with other Manufactured Housing Institute (MHI) members. [Boor is currently MHI's chairman](#).

So, among the topics that will be considered in Part II is antitrust law. To set the stage, many legal observers are striving to read the tea leaves for antitrust enforcement under Trump 2.0. Among them is this one from the *National Law Review*.

The Trump Administration Dismantles California's "Clean Truck Partnership" Through the Use of Antitrust Law

by: [Jacob H. Hupart](#) of [Mintz](#) - [Mintz Insights](#) | Saturday, August 16, 2025

Mintz said the following.

This action by the FTC is part of a broader effort by the Trump Administration to overturn environmental regulations enacted by Democratic governments (whether state or federal), and generally to pursue a rollback of various ESG initiatives, especially those concerned with climate change. It also reflects the tactical choice by the Trump Administration, and Republican state governments across the United States, to employ antitrust law as a means to attack various agreements among industry participants to adopt collective solutions to address climate change. Their success here will likely prompt additional efforts along the same lines.

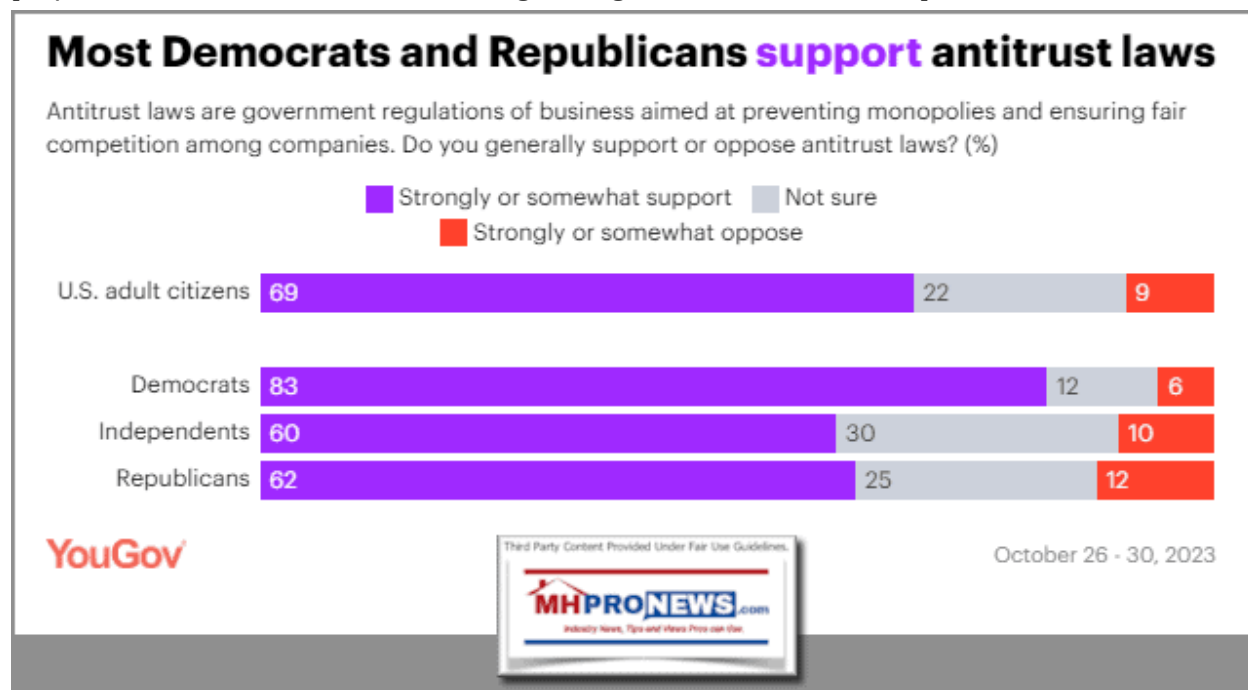
Some observers are saying Trump 2.0 is going easy on apparent antitrust violators. Others are less certain.

Routinely left-leaning Trump critic and antitrust advocate via BIG, Matt Stoller, said the following. Bold is added for emphasis by *MHProNews*.

Some of the news of the week includes a child sex scandal revealed at the NFL Players Association, Ticketmaster got humiliated in Maine, and **new data was released showing it's increasingly hard for big business to find jurors who don't hate corporations.**

That bold-for-emphasis remark should not be a surprise. *MHProNews* has previously reported that antitrust support is high among both Democratic and Republican voters.

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<https://www.manufacturedhomepronews.com/manufactured-home-employees-want-a-17-percent-pay-hike-per-yougov-most-americans-oppose-monopoliesfacts-views-potential-benefits-battling-oligopoly-style-monopolization-plus-mhville-markets/> and <https://www.manufacturedhomepronews.com/maris-jensen-univ-study-market-foreclosure-in-manufactured-housing-antitrust-violation-alarms-distort-competition-to-monopoly-outcome-named-specific>[caption]

As *MHProNews* has [previously reported](#), there are evidence-based reasons to believe Cavco is engaged in a multi-year effort that appears to violate antitrust law and involves other Manufactured Housing Institute (MHI) members. More on that in Part II.

With those notions in mind, it is a good time to pivot from this preface into some housekeeping items prior to the Cavco Industries Q1 2026 Earnings Call Transcript.

Highlighting in what follows is added by *MHProNews*. Highlighting should not deter readers to ignore or downplay other parts of the SA transcript. Minor edits of SA's transcript (spacing errors, for example) are by *MHProNews*, but have not changed the meaning of the words as shown.

The commentary should be considered in part through the lens of the recently (8.7.2025) published report on Cavco's financials, linked [here](#).

Part I

Cavco Industries, Inc. (CVCO) Q1 2026 Earnings Call Transcript

Aug. 01, 2025 8:34 PM ET [Cavco Industries, Inc. \(CVCO\) Stock](#)

Cavco Industries, Inc. (NASDAQ:[CVCO](#)) Q1 2026 Earnings Conference Call August 1, 2025
1:00 PM ET

Company Participants

Allison K. Aden - Executive VP, CFO & Treasurer

Mark Fusler - Director of Financial Reporting & Investor Relations

Paul W. Bigbee - Chief Accounting Officer

William C. Boor - President, CEO & Director

Conference Call Participants

Daniel Joseph Moore - CJS Securities, Inc.

Gregory William Palm - Craig-Hallum Capital Group LLC, Research Division

Jay McCanless - Wedbush Securities Inc., Research Division

Jesse T. Lederman - Zelman & Associates LLC

John Dundee Lapey - Gabelli Funds, LLC

Operator

Good day, and welcome to the First Quarter Fiscal Year 2026 Cavco Industries, Inc. Earnings Call Webcast.

[Operator Instructions] As a reminder, this call may be recorded. I would now like to turn the call over to Mark Fusler, Corporate Controller, Head of Investor Relations. Please go ahead.

Mark Fusler

Good day, and thank you for joining us for Cavco Industries First Quarter Fiscal Year 2026 Earnings Conference Call.

During this call, you'll be hearing from Bill Boor, President and Chief Executive Officer; Allison Aden, Executive Vice President and Chief Financial Officer; and Paul Bigbee, Chief Accounting Officer.

Before we begin, we'd like to remind you that the comments made during this conference call by management may contain forward-looking statements. Forward-looking statements include statements about our expected future business and financial performance and are

not promises or guarantees of future performance. They are expectations or assumptions about Cavco's financial and operational performance, revenues, earnings per share, cash flow or use, cost savings, operational efficiencies, current or future volatility in the credit markets or future market conditions.

All forward-looking statements involve risks and uncertainties, which could affect Cavco's actual results and could cause its actual results to differ materially from those expressed in any forward-looking statements made by or on behalf of Cavco. For a discussion of material risks and important factors that could affect our actual results, please refer to those contained in our filings with the SEC, which are also available on our Investor Relations website and at [sec.gov](https://www.sec.gov).

This conference call also contains time-sensitive information that is accurate only as of the date of this live broadcast, Friday, August 1, 2025. Cavco undertakes no obligation to revise or update any forward-looking statements, whether written or oral, to reflect events or circumstances after the date of this conference call, except as required by law.

Now I'd like to turn the call over to Bill Boor, President and Chief Executive Officer. Bill?

William C. Boor

Welcome, and thank you for joining us today to review our first quarter results for fiscal 2026.

I'm happy to report it was a very strong quarter. Revenue was up 9.5% year-over-year and 16.6% sequentially. Our operating profit was up about 50% compared to both last quarter and a year ago, all operations contributed to these results, and I'll get into that.

Over the last several quarters, we've been executing on a plan to push production up where we have the backlog to support it. Increasing production rates can take some time. So this has been a decision in many of our plants between pressing forward with increases to take advantage of a possible continuation of the positive order trends. We're holding back out of concern that the trend might not hold in future quarters. We have deliberately chosen to press forward with the confidence of knowing our plants can adjust down if necessary.

While uncertainty about future quarter demand remains, this quarter our plan paid off. Orders increased resulting in an essentially flat sequential backlog even with our increased level of production. Executing this plan resulted in a record of 5,416 homes shipped this quarter.

We're often asked about regional differences on these calls, and I feel that, in most cases, there aren't any headline takeaways. The regions often show differences from quarter-to-quarter, but they tend to keep pace with each other over time.

This quarter, I do want to point out that the Southeast region did lag the orders with Q1 shipments very slightly below the preceding quarter. Our backlogs in the plant serving the Southeast have dropped, and we'll need to watch closely to see if we're able to maintain production levels there. We manage this on a plant-by-plant basis, and it just points to the continuing uncertainty in the overall market.

Another noteworthy result this quarter was the increase in average selling price. As we've discussed before, there are several factors affecting our ASP. First is the proportion of company shipments that go through our owned retail stores. This quarter, that driver actually had a downward effect on ASP because sales through our stores were relatively flat while wholesale shipments to third parties increased.

Next is the mix of single section to multi-section home shift. We saw the mix shift toward -- we saw that mix shift towards multi-section homes this quarter, which pushes ASP upward. However, the biggest effect this period was an increase in the average price for both single section and multi-section homes sold. This is the best approximation for the price of similar products from period to period. So we saw true price appreciation this quarter after a very long run of very modest declines. Whether this first upward move in a while becomes a trend depends on the direction of the industry orders going forward.

I don't want to miss the opportunity to point out the strong performance in Financial Services, which turned a significant loss a year ago into a nice profit this year, driven by better insurance results. It's never fun to explain that bad weather was the cause of poor insurance results, no one likes to hear that reason.

This quarter, it's only fair to acknowledge that favorable weather contributed to the year-over-year improvement. It's also important to understand that on top of the relatively good weather, we have made very meaningful improvements to our underwriting criteria and policy pricing, which are significantly improving the results under any weather conditions. Our insurance operations have done a fantastic job making sure policies are priced right for their risk, and we expect continuing strong results over time.

Shifting topics. A few weeks ago, we announced the agreement to purchase American Homestar. The acquisition, which will use approximately \$184 million in cash, is expected to close early in our third quarter. As previously discussed, this deal brings with it an opportunity for significant cost reduction as well as product and retail optimization benefits.

Since the announcement, members of our leadership team have had the opportunity to visit many of the American Homestar operations. The introductory visits confirmed what

we knew in general and from our due diligence work. This is the first class organization, and we continue to be very excited about what they will bring to Cavco.

The American Homestar acquisition, along with ongoing investments throughout our operations, demonstrates the execution of our capital allocation priorities. We also continued our 4-plus year buyback program, repurchasing \$50 million of stock this quarter. Cumulatively, since the initial repurchase authorization in fiscal 2021, we've bought back 16.6% of our outstanding shares. With strong cash flows and a conservative balance sheet, we remain confident that we can repurchase shares without hindering any strategic opportunities.

Now I'll turn it over to Allison to give more detail on the financial results.

Allison K. Aden

Thank you, Bill. Net revenue for the first fiscal quarter of 2026 was \$556.9 million, up \$79.3 million or 16.6% compared to \$477.6 million during the prior year. Sequentially, net revenues increased \$48.5 million, driven by an increase in homes sold and the average revenue per home sold. Within the Factory-Built Housing segment, net revenue was \$535.7 million, up \$77.6 million or 17% from \$458 million in the prior quarter. The increase is primarily due to a 14.7% increase in homes sold and a 1.9% increase in average revenue per home sold.

The increase in average revenue per home was due to product pricing increases and more multi-wides in the mix, partially offset by a lower proportion of homes sold through our company-owned stores. Capacity utilization for Q1 of 2026 was approximately 75% when considering all available production days versus 65% in the prior year quarter.

Financial Services segment net revenue was \$21.2 million, up \$1.6 million or 8.2% from \$19.6 million in the prior year quarter. The increase was due to higher insurance premium rates, partially offset by pure loan sales and fewer insurance policies in force. Consolidated gross margin in Q1 as a percentage of net revenue was 23.3%, up 160 basis points from 21.7% in the same period last year.

In the Factory-Built Housing segment, the gross profit was 22.6% in Q1 of 2026, consistent with Q1 of 2025. Financial Services gross margin as a percentage of revenue increased to 40.9% in Q1 of 2026 from a negative 0.6% in Q1 of 2025. This increase is primarily due to the insurance division having fewer claim losses from storms as the prior year period was significantly impacted by multiple weather events in Texas and New Mexico.

Selling, general and administrative expense in the first quarter of 2026 was \$69.1 million or 12.4% of net revenue compared to \$64.9 million or 13.6% of net revenue during the same

quarter last year. The increase was due to higher bonus and commission expenses on higher earnings compared to the prior year. Interest income for the first quarter was \$5.1 million, down from \$5.5 million in the prior quarter. Pretax profit was up 48.9% this quarter to \$65.3 million from \$43.9 million in the prior year period. The effective income tax rate was 20.9% for the first fiscal quarter compared to 21.5% in the same period in the prior year. Net income was \$51.6 million compared to net income of \$34.4 million last year, and diluted earnings per share this quarter was \$6.42 and versus \$4.11 in last year's first quarter.

Before we discuss the balance sheet, I'd like to take a minute to talk about capital allocation. During the first quarter, we repurchased \$50 million of common share under our Board authorized share repurchase program, leaving approximately \$178 million under authorization for future repurchases. Additionally, we announced our intention to acquire American Homestar, a transaction expected to utilize roughly \$184 million in cash.

Our capital deployment will continue to align with our strategic priorities, which include enhancing our plant facilities, pursuing additional acquisitions and consistently assessing opportunities within our lending operation with share buybacks serving as a mechanism to prudently manage our balance sheet after considering these initiatives.

Now I'll turn it over to Paul to discuss the balance sheet.

Paul W. Bigbee

Thanks, Allison. In the quarter, we had a decrease in cash and restricted cash of \$6.9 million, bringing our balance to \$368.4 million. We generated \$55.5 million of cash from operating activities, reflecting solid operating performance for the quarter. We used \$7.7 million in investing cash flows for new equipment in certain facilities and used \$54.7 million in financing activities, primarily due to stock buybacks.

Comparing the June 28, 2025 balance sheet to March 29, 2025, the increase in accounts receivables related to organic growth in the Factory-Built Housing segment with unit shipments up 7% in the first quarter of 2026 versus the sequential quarter. Inventories increased from higher finished goods of company-owned retail stores as well as higher raw material purchases to support increased production. The decrease in prepaid expenses and other current assets is a result of lower federal income tax prepayments primarily related to timing.

Increase in long-term commercial loans receivable is a result of increased lending under these programs as a result of larger sales volume. Accrued expenses and other current liabilities are up from the increased compensation and bonus accruals on higher earnings,

increased insurance loss reserves and higher customer deposits. And finally, as previously discussed, treasury stock increased due to stock buybacks executed during the quarter.

Now I'll turn it back to Bill.

William C. Boor

Okay. Thank you, Paul. Michelle, let's go ahead and open up the line for questions.

Question-and-Answer Session

Operator

[Operator Instructions] And our first question comes from Daniel Moore with CJS Securities.

Daniel Joseph Moore

Obviously, the plan paid off, new orders increased nicely this quarter. Is that a level of ordering -- is that level of ordering continuing thus far into fiscal Q2, accelerating at all? Or do you expect that to moderate in coming quarters?

William C. Boor

Yes. No real comment on the expectation. I mean you hit these months in the summer. And from a seasonal perspective, it can slow down a little bit. But we feel like at a high level, there's kind of a continuation. I mean there's definitely nothing that I'm seeing in the market or hearing about that says that we're seeing a drop. And I always refer as well -- even though I know it's a bit of a lagging indicator, I always refer to the HUD code shipments data on a seasonally adjusted basis, and that has remained strong in recent months. So we're still feeling like -- as I've indicated, I mean, we're really happy with the quarter I think we executed really well as a company. Uncertainty continues out there. So we're going to have to keep watching.

Daniel Joseph Moore

Very helpful. You mentioned the Southeast. I mean, obviously, Florida has been challenged for a while. Are there [indiscernible] you're seeing any incremental softness?

William C. Boor

Yes. Thanks. That's an opportunity to clarify because I didn't really think to make that as clear. Florida has been in its own situation for quite a while. And I'd have to say I really don't see any improvement there. Just in general, I think the real estate market there has been

struggling. So we're holding our own and hanging in there and feel good about how we're positioned.

But my comments -- again, Dan, thanks for giving me a chance to clarify. My comments were a little broader than that and almost exclusive of Florida, which acts very separately. So you kind of -- you go up through the Southeastern states, and I don't want to sound like doom and gloom. I mean it was steady. In our case, as I talked about this direction of let's go ahead and lean into the backlogs we have, our plants have done a great job of accelerating production through that region. And compared to the other regions, it was a little of a standout lagging region for us this quarter as far as quarter-over-quarter activity.

So I don't know how to give the right tone on this, so I'll just kind of going to be as straightforward as I can with my comment. It's not doom and gloom, but it was the slowest of our major regions when we looked at what was generally a pretty positive quarter-to-quarter.

Daniel Joseph Moore

Got it. And okay. I'll follow up offline. But ASPs gave great color, greatly appreciated. Between the 2 factors, is it more a function of passing on inflation and input costs? Or is the mix meaningfully improving as well?

William C. Boor

Yes. Mix shifted a little bit to multiple section homes, which, of course, would kind of be an upward move. But I'll tell you the biggest factor this time was really that we say same product appreciation. We really looked at in aggregate, single-section homes, did they move up in average selling price? And I'm thinking wholesale right now and multi-section homes, did they move up as well? And this quarter both moved up, and it's been a long time since we've seen that kind of price appreciation after correcting for product mix and after correcting for the proportion that's sold through our retail stores. So I did want to point out because I know there's been a long discussion about -- I keep overusing the term slow leakage that we have seen for a number of quarters in that, let's call it, pure price.

And there was a significant upward bump this time. Again, those things can move around a little bit, but it's nice to see it move that direction.

Your other question was whether that was I think -- Dan, I think your other question was whether that was due to tariff pressure. I don't want to belabor it. I've got a little different view than some when we talk about this. It's a matter of price moving up where supply and demand for our products was healthiest, right? So we did have an impact from tariffs, and Allison commented on that, I believe, that we can go into that. And -- but I don't view us as

necessarily being able to say, oops, our product -- our cost just went up, so we're going to pass through a price increase if the market doesn't support it. So I look at this price movement kind of as its own data point separate from our cost structure.

Daniel Joseph Moore

Okay. Very helpful. I know you don't give guidance. Financial Services had a really solid quarter. Just curious what you've seen so far quarter-to-date in terms of claims. Obviously, there's been some well-documented tragic flooding in Texas. I know it's isolated and your business is a lot more geographically diverse, but what are you seeing so far there?

William C. Boor

Yes. Yes, you've said it well. I mean it was tragic what's going on there. From a claims perspective, it was not a huge generator of claims. And I think that's the nature of the pretty not dense area that a lot of that -- the flooding occurred. So we're not seeing an inordinate amount of claims from that event. And I think things are looking pretty good overall from a business perspective in insurance. And you're right, we do, do, I think, a very thorough job of making sure we diversify geographically and in other ways to spread the risk in our insurance business. But nothing big to note from that event or any others recently.

Operator

Our next question comes from Greg Palm with Craig-Hallum.

Gregory William Palm

I wanted just to maybe clarify some of the prior questioning on kind of the regional differences. So going back to your comments on the Southeast region, I just -- is it more that you're seeing increased competition down in that region? Or is it a function of like the actual consumer traffic rates, deposits are slowing? I was just -- maybe you can kind of dig into that a little bit more. And then just to be clear, I mean, the Southeast region is pretty broad. So are there specific states that you're trying to call out or anything in particular?

William C. Boor

Yes. We kind of just look at our plants that serve that area, and there's a pretty broad service radius for a plant. So frankly, we're looking at it all the way up to North Carolina and Virginia. So kind of Georgia up through North Carolina and Virginia. And I really do want to -- I'm glad you guys are asking me the question because I really do want to clarify. We had a quarter here where orders moved up considerably. In the Southeast, they were more like flat. So we're not seeing a big downturn. And I think the context and why I pointed it out is

that we have also had this direction on a plant-by-plant basis to increase production where we think we've got the backlog to do it.

And so my point really was more about that direction. And I don't know how it's going to play out yet. But what I was trying to point out is we might have -- we were going to have to look plant by plant in that area because its order rates have lagged other regions recently, and our backlogs in that area have dropped given the increase in production. And so it's one that we might have to pull back a little bit on some of those production increases. I'm honestly not predicting that. I'm saying that these regions are moving differently. And if there's one place that we're keeping a close eye on it to see if our backlogs hold with order rates in the next couple of quarters so that we can maintain the increased production level, it would be the Southeast. So it hasn't been a downturn. It's been a flat spot in a country where other regions are moving up pretty nicely.

Gregory William Palm

Okay. That's helpful. What are you seeing from the community channel and some of the bigger buyers there? Any change relative to kind of what you're seeing in the dealer channel?

William C. Boor

Yes, I don't think anything noteworthy. I mean once we got through the inventory problem that we talked at length about for a long period of time, and that kind of -- we declared that dead last December, I think. Once we got through that, they've kind of taken their place with more of a historical proportion of overall industry shipments from what we can tell. They've been about 30% or call it, 1/3, and that's if you include builders and developers along with communities. And there's some normal bouncing around those numbers, but I feel like they're kind of in that position right now.

Gregory William Palm

Okay. In terms of -- I want to maybe spend a minute on gross margin as well. And maybe you can just comment on input costs and what kind of -- I don't know if you're able to quantify kind of what impact tariffs had, whether it was on steel specifically or whether it was some of the components that you bring in. But was that meaningful at all? Are you able to quantify kind of what impact you saw? And mostly, this is just in light of kind of much higher production rates on a year-over-year basis, but factory margins that were -- they're relatively flat. So I'm just kind of trying to tie those out.

Allison K. Aden

Yes, understood. Thanks for the question. Because many of the tariffs have been delayed, plus there's a time line before costs hit our COGS, the full effect of tariffs didn't hit our results in Q1. We estimate that the total impact in Q1 was about \$700,000 of additional expense, and that would have hit our cost of goods. And if the current -- for a perspective point, if the currently proposed tariffs take effect, I'd say this will certainly increase in future quarters. So nothing significant this quarter, but we really focus on it.

And in general, input costs, as you mentioned in total, it's key components for us that affect the margin are the cost of our commodities that we primarily use, which is lumber and OSB. And while the movements of these commodities, they really can be volatile. We have been -- recent quarters have been benefiting from a pretty low and stable lumber and OSB price. But there's always a possibility of there being a price increase ahead. And the way that we can all watch that is we watch the indices for these commodities for lumber and for OSB. And any changes that we see rolling through those prices, we'll go through our COGS in about 60 to 90 days later. So taking all those factors into account kind of on the cost side of the equation for the margins.

Gregory William Palm

Got it. And then maybe just last one, shifting gears again, just to the regulatory environment. Can you provide maybe any update? I know there was a recent bill that was introduced about chassis removal. So maybe you can just give us some insight in what that potentially could mean and just the overall process of putting that into a law, if that's the case.

William C. Boor

The Senate Committee passed a bill or moved a bill forward this past week, and I think that's what you're referring to. And I'll tell you what was really encouraging about it, they had -- and I might be off by 1 or 2, but they had about 8 subsections under that housing bill. And one of them was literally titled manufactured housing. And so one takeaway that I took at a high level from that was just we are in the discussion. We -- people are focusing on manufactured housing as an important part of the solution to the affordable housing issues that we face and the supply issues we face. So that was a high level.

As you said, the chassis removal from the federal definition was in there. And so I feel really good about that. That's something we've talked in the past. It will take some work and some time. But if we can get that out of the definition, I think it's going to open up a lot of innovation for our industry, and that will kind of allow us to do things like penetrate more into urban settings as an example. So that's a big plus. There was some stuff in there about kind of trying to continue to encourage local municipalities and states to work on zoning.

Those statements in the bill were more general and weren't all that specific to manufactured housing. But directionally, you always like to see that because I think Congress understands that's a real barrier to improving the supply of homes and housing units.

You weren't really asking us if I -- and this is probably a longer conversation for another day. If I had a disappointment when I read it and talked to folks about it, it's that Congress is trying to provide some support and funding for community preservation and community development in general, but they tend to be a little bit discriminatory in the ownership of those communities. And so they're very focused on this idea of resident-owned communities. In the right situation, that can be a good solution. Sometimes they aren't everything that the name kind of implies and sometimes they're really not working out well. And so the fact that Congress continued in this bill to kind of leave the very successful for-profit community ownership model out was a little bit concerning.

So probably giving you more than you want. I feel like in total, it's a very good step forward. It reflects a lot of the lobbying we've done in D.C. to try to get manufactured housing more part of the conversation. I feel like we're really having some success with it. So I do bet that's more than you're asking for, Greg, but did I leave anything out?

Gregory William Palm

No. It was more the better. I appreciate the color.

Operator

Our next question comes from Jay McCanless with Wedbush.

Jay McCanless

So I guess I want to stick on the gross margin for a minute because to hear that volumes up, pricing is up on singles and doubles and OSBs at multi-decade lows, just really surprised that the gross margin was flat year-over-year. Can you walk us through what drove that? And are you all thinking -- and if it was sales mix or geographic mix, is the same type of pattern developing for the second quarter?

Allison K. Aden

So if we go through -- we look at the throughput for the quarter, to your point, we did see an uplift that allowed us to leverage some of our factory overhead. As we talked about, we did absorb some additional costs due to tariffs. And also our margins are dependent quite a lot on quarter over prior year quarter for pricing. So there were some very positives in our gross

profit and gross margins for the quarter. And then also touching on Financial Services, we did see an uptick from prior year.

Jay McCanless

Okay. So it's more just geographic mix? And also, are you seeing that in the second quarter kind of that same thing developing?

Allison K. Aden

I think it's probably a little too early to comment on the second quarter. I'd say the one thing that we do have -- obviously, we're staying extremely close to would be the unfolding tariff situation. We do -- as we've shared before, we do have -- we do purchase many lighting, electrical and plumbing components and windows and doors. And those are primarily sourced from China. So that will be where our focus is as the tariffs continue to unfold.

Jay McCanless

Okay. And then I know that there's been a couple of price increases announced for roofing. Has that started to impact Cavco's income statement yet?

Allison K. Aden

Nothing that we can really comment on at this point, nothing significant.

Jay McCanless

Okay. And then if we could just talk about Chattel mortgage, where are rates right now? And I guess the other question is, are you guys seeing and what the site builders have talked about where people just aren't as confident maybe as they were this time last year? And maybe talk about that and then also where rates stand at this point?

Mark Fusler

Yes, I'll start with the rates, Jay. So it's actually been really consistent since we last reported our fiscal year-end. So it's still in that 8% to 9% range.

William C. Boor

Yes. I think the indicators of confidence are kind of almost week-to-week, if not day-to-day. It's been kind of in this mode, in my opinion, for quite -- well, several quarters, right? I mean people are trying to read the macroeconomics. And certainly, there's a bit of uncertainty on the side of the potential buyer. We see that -- I think we see that more in closing rates, but we've seen traffic does move up and down a bit, but it moves in a pretty tight band or it's been moving in a pretty tight band. Closing rates, I think, are the better indicator at any

point in time about whether people are willing to pull the trigger because there's a lot of people that are out there that need homes and they're generating the traffic numbers. It's whether they feel confident and are able to pull the trigger on actually making a deposit and falling through on the purchase that I think it gets hurt when the confidence goes down.

So I don't mean to wander around your question. I think it's -- man, it's changing all the time, and that's the uncertainty we've been talking about. This quarter, orders showed a pretty big uptick. So that shows that either over the period of that quarter, there was a little more confidence or it shows that, that pent-up demand for housing is powering through that concern. Hard to tell, but we feel like we had a nice uptick this time. We're going to continue leaning into it, and we got to be ready to adjust. It's hard to be more predictive than that.

Operator

Our next question comes from Jesse Lederman with Zelman & Associates.

Jesse T. Lederman

A nice job on the quarter. I'd like to ask another question on the tariffs. So I guess, just \$700,000 of impact in the COGS from tariffs. Is the expectation still about 5% to 8% of the materials might be the impact from tariffs?

Allison K. Aden

Yes. And let me just help by putting those -- that into dollars to make it straightforward. So we would estimate that the overall impact that we could reach, and again, tariffs literally are kind of unfolding day-to-day as we're all seeing it, but we could reach between \$2 million and \$5.5 million a quarter if the current tariffs are fully implemented. So just hopefully, that helps provide some...

Jesse T. Lederman

Got it. Okay. Yes, that is helpful. Okay. So I guess the \$2 million -- and again, the material is half of the COGS, right?

Allison K. Aden

Yes, they do.

Jesse T. Lederman

So the \$2 million, I guess, would be something like -- during the quarter, it would have been like a 1% increase to overall COGS from tariffs, which seems a little bit lower, I guess, than you're expecting last quarter.

Allison K. Aden

That's true. I mean, I'd say specifically, again, \$700,000 was the amount of the impact of increased cost of goods from Q1 from tariffs. If you think about the tariffs, they seem to be moving quite a bit. But obviously, I think when you -- when one listens to the rhetoric out there, there's an indication that they will go up at some rate. And certainly, if we compare the way we think about it now versus,

say, just a quarter ago, the tariffs would be coming in a slower or delayed and a little bit more choppy. So I think that's what we stay very close to.

And if we take a step back, the \$2 million probably per quarter -- the \$2 million per quarter would be on the lower end and perhaps as we progress through time and yet it's an unfolding situation, it could reach up to about \$5.5 million. And I would say that if we had to think about it as far as where is the majority of that coming from, it's likely to be coming from the lighting, electrical and plumbing components, which are part of all of our units and those we source out of China.

Jesse T. Lederman

Okay. That's really helpful color. I wanted to ask with -- through CountryPlace, Bill, do you guys have any read on -- or even through CountryPlace and/or just through those that are buying at your captive retail of the household income over time of people that are purchasing or maybe even quarter-to-quarter that could give some insight into mix shifts. So for example, if maybe this quarter, you had more higher household income at retail or through CountryPlace, that would suggest maybe some people mix shifting from an existing home or buying a new home to a manufactured home. Is that something you guys have insight into?

William C. Boor

Yes. Obviously, when you're originating, you know all that information. So it exists. It's not something that we've tracked very closely at a macro level. So it's an interesting thought and something we'll think about. But I don't have any statistics for you right now on that.

Jesse T. Lederman

Okay. And then yes, of course, I think that would be pretty interesting. Allison, you kind of talked from a capital deployment perspective, one of the initiatives you're looking into is assessing some opportunities within the lending operations. Could you maybe provide a little bit more color into what that opportunity might be?

Allison K. Aden

Yes. I mean, strategically, we look at our CountryPlace, which is our mortgage origination component of our organization to be able to provide expanded consumer-based lending programs. So we continue to look at that. And as part of that growth would probably be a combination of somewhere strategically to have an ability to deliver into a forward flow agreement. We have a commitment that we would not carry consumer-based loans on our balance sheet, nor have we. So if we embark on that type of a longer-term strategy, our balance sheet would still very much stay an OEM balance sheet. But this would give us an opportunity to serve a wider base of consumers to help them be able to obtain affordable housing.

William C. Boor

Yes. I'd like to -- I mean, let me just reiterate that, and I'm not saying anything different. I mean our model is to originate and sell, right? We don't want to carry consumer loans on our balance sheet. We retain the servicing rates, and so we get an annuity stream in that sense. That's our base model. Over the last couple of years, the traditional investors have really kind of dramatically reduce the amount of loans they're buying. And so that left us with a decision to make. And we have been willing to, and we've put some new loans on our balance sheet. We do that in a way where we know that we're still underwriting to the standards that an outside investor would buy those loans.

And so our game plan really is let's not stop the machine, let's keep supporting the operations as an originator to a point with the intent that in different times and maybe through finding more consistent investors, we'll be able to clean those loans off the balance sheet and get back to the base model again. We haven't committed very much money in the scheme of our balance sheet to that, but it is something we just highlight for folks that strategically, we'll do that from time to time. We'll take some on our balance sheet with the intent that when the day comes, they're very sellable loans.

Jesse T. Lederman

Got it. That's helpful. Yes, I think in a lower rate environment, those loans would be an attractive opportunity for an investor for you to get those off the balance sheet. But it makes sense. It sounds like you're willing to continue to underwrite those just to keep the machine moving from a financing availability perspective.

Last one from me -- yes, go ahead.

William C. Boor

This is a side note extending on that. It's interesting when you do find an investor that wants to start buying those loans, they often -- the moment they make that decision, they say,

what do you got for me right now? And so having a few on the balance sheet doesn't hurt when you're trying to develop those relationships.

Jesse T. Lederman

Right. Makes sense. Last one on the Financial Services. It sounds like a lot of the initiatives that you talked about over the last couple of years in terms of making improvements to your underwriting criteria and pricing and some of those nuances are coming to fruition with kind of a 40-ish percent gross margin. If I look historically, you're kind of in the -- even like 50% to 55%-ish range. So is there any reason why the gross margin for Financial Services shouldn't at least remain around current levels, if not continue to grow a little bit higher toward maybe 50%-ish, something around there?

William C. Boor

Yes, it's very choppy, right? I mean it's the insurance business, not to minimize the financial or the lending business component of that. But when you're in the insurance business, quarter-to-quarter, it can be choppy. But yes, I don't see any structural reasons why we shouldn't be able to maintain pretty much historic margins with that business. So yes, I appreciate the question because it is hard for you all to keep your bearings with us in Financial Services when quarter-to-quarter, we can see pretty dramatic changes. What I've said in the past, and I still believe is that these businesses give us a solid return on invested capital, and they are complementary to our core business. So we're committed to them.

Operator

[Operator Instructions] Our next question comes from Daniel Moore with CJS Securities.

Daniel Joseph Moore

1 or 2 more. But obviously, if you look at your shipments, you look at HUD code, MH data, it's clear that MH, at least over the last couple of quarters, and particularly this quarter is diverging in a more material way from traditional site-built growth rates. So is that -- do you think, Bill, that's more a normalization of the builder developer channel coming back? Or do you see that occurring kind of across all of your key customer bases, REITs, traditional retail, et cetera?

William C. Boor

And you're talking about -- I think I'm with you, you're talking about how HUDs what we have good data on. You're talking about how HUD code shipments have changed through the recent year or 2 compared to how site built has changed?

Daniel Joseph Moore

Yes. And obviously, 15% growth in your shipments is another data point there as well relative to flat to down traditional cycle.

William C. Boor

We've moved relative to HUD. Yes, you're right. I mean, yes, it's always hard to know what point in time to index off of, but we have been looking at that pretty closely. And to your point, over the last, call it, 1.5 years that was one of the points I looked at, HUD has dramatically outperformed. I track a lot of times new home sales, thinking we're shipping is kind of put in service pretty quickly and the new home sale is similar, put in service pretty quickly. And HUD has really outperformed site built during that period. I think at the highest level, there's probably a lot of factors to that. I think one is I've tried to point out in a lot of investor discussions that -- while we're driven by some of the same macro effects, like interest rates, the cycle for manufactured housing and homes and site built can diverge.

If you think back to 1.5 years ago or so, we were held back by an inventory in our retail channels after the run-up in interest rates. Conversely, I think site builders were kind of getting a tailwind from the fact that people had low interest rates and previously owned homes weren't on the market in inventory. So they were kind of making hay at a time that we were pulled back from a wholesale perspective. I think that's reversed right now. I think right now, we've got the inventory out of the way and affordability is coming to the forefront as it has been and should be for, in my opinion, for the foreseeable future.

And . So I think it's a real shift. And if the macro economy supports it, I think that, that relative share of new housing units, if you want to think about it that way, should really go in favor of manufactured housing, too, and I won't belabor this point because if you pick different time periods, the discussion would be different. We've certainly done pretty well relative to the index of HUD code shipments that are reported on a national basis.

I think that a lot of that is due to some things we've worked hard over the last couple of years to put in place. I've mentioned them before, but we've got what I think is a very effective national sales group in the wholesale business that our competitors had previously, and we didn't have, and I think they've been making a big impact. We've done a ton in digital marketing, and we followed that up with the branding that we talked about last quarter to try to make the customer experience better. So I really feel like we've done a lot to position ourselves better and better on a competitive basis within manufactured housing. And I'd like to think that's showing itself in some of that movement of us compared to the industry shipments.

Daniel Joseph Moore

Very helpful. My last long-winded question today, I promise. But just I missed the American HomeStar conference call. So you're expanding what is already a strong presence in Texas. Obviously, Texas has always been a big important market for MH, but a little choppy of late. So what are you seeing or hearing from retailers, community developers in that market and your expectations for growth in that market, not next quarter, but over the next 2 to 4 years?

William C. Boor

Yes. I think my answers have been long-winded, not your questions. But Texas, everyone knows how big of a market that is for manufactured housing, and we do have a pretty good presence there. And in the call and otherwise, I've talked about you got some deals where you are going into new geographies or trying to round out your geographic presence. And you've got others like this one where you're just going to get stronger where you are. And I'm really excited about it from that perspective. We have a lot of confidence in Texas over any strategic time frame.

So really don't do these kind of deals, worried too much about what's going on right now. And what's going on right now in Texas isn't bad. They've been growing. So we're going to have a lot of opportunities for value creation in that deal through cost benefits as well as product and retail optimization. So we're really excited about it. I'm not sure if I'm really hitting hard on your question, and I'm happy to take another shot, Dan, but that's a stab at it.

Daniel Joseph Moore

No, that's helpful. Right now, the market is holding up pretty well, and you see continued growth. That's what I was getting at. I appreciate it very much.

Operator

Our next question comes from Ian Lapey with Gabelli Funds.

John Dundee Lapey

Bill and team, congratulations on a great quarter. I just had one quick one. The \$9 million in CapEx for the quarter, was that driven by the brand realignment? And then would you expect CapEx to return to the more -- the level of more like \$4 million to \$5 million of the last -- per quarter for the last couple of years?

William C. Boor

Yes. Thanks for the question, Ian. The \$9 million was not driven by the brand realignment. In fact, really the only meaningful material impact you guys should see from that, I think, was

the last quarter when we reported the noncash \$10 million charge that was related to writing off some intangible value. But going forward, we shouldn't really have a meaningful impact to the P&L from that shift.

I want to take a stab and then Allison and others can build on to this. The \$9 million is a good story because what we've been doing is investing in our plants. And we've had a string of very successful smaller investments in our plants. I say small in the scheme of the company, but they add up. And we've done a number of plant modernizations that have been very successful, and that's what's driving that non-acquisition capital expense to go up a little bit. So I'd ask you to feel good about that. We're making some pretty high-return investments in our plants, and we're growing our capacity.

Does that -- do you have something to add to that?

Allison K. Aden

Yes. That's obviously a very good characterization. So it will -- our cap spend will be a little bit lumpy within a pretty tight band, and it will move quarter-to-quarter based on the upgrades and expansion for efficiencies in the plant, in our internal plants. But there's nothing in that particular number for the quarter that would signal an upward trend of any type.

William C. Boor

And it's not like a pent-up sustaining capital that's coming due or anything like that. Our plants are in pretty good shape.

Operator

Our next question comes from Jay McCanless with Wedbush.

Jay McCanless

I was just looking at last quarter's transcript, and I think the one thing we haven't talked about is the price competition that you all were seeing last quarter. And just wondering if that's reemerged either what you saw in the first quarter? Or are you seeing any signs of your competitors being a little more aggressive on price in the second quarter to try and drive some volume?

William C. Boor

I would generally say no. If there's -- if you kind of had a dial on this, there's more -- this is kind of my feel based on the monthly detailed conversations we have with every one of our plants. There is more of an upward bias that I'm hearing in the local markets than

downward. And I will say that for this quarter, and I only want to emphasize that because these things can shift on your right. We're not calling a trend after one data point. For this quarter that we saw this pretty nice increase in both single section and multi- section homes. That was pretty much across the board regionally. So we really don't have hotspots where we're seeing an undue amount of price competition right now.

Operator

And our next question comes from Jesse Lederman with Zelman & Associates.

Jesse T. Lederman

Real quick, I just want to give you kudos for the SG&A. It looks like as a percent of revenue, it's among the lowest levels since maybe fiscal '23. Just wanted to kind of understand if that kind of expense management on the SG&A line is kind of a conscious decision or if there has been expenses over time that you've been able to pull out of that line. Anything -- any color you can give there would be great.

Allison K. Aden

Sure. With regards to SG&A overarchingly, our approach to our business model has always been to maintain a good part of that SG&A to be variable. And so the largest component there that moves with volume as an increase is sales commission and variable compensation. We do very carefully watch the fixed cost. So it's -- the SG&A in general leverages quite a lot as we increase the top line. So our approach has been consistent. We also are continually in putting -- instituting processes and procedures that add to our shared services so that when we continue to grow both organically and inorganically, the shared services and the back office can serve the field at a lower per unit cost. So it's more of a continuation of our commitment to maintain a very low fixed cost component for SG&A.

William C. Boor

Yes. We definitely want to see what we saw. I mean, get that leverage on the fixed costs as we grow. So I appreciate you raising the question.

Jesse T. Lederman

Yes, of course. So the fixed costs really you're talking about are the kind of shared services back-office type stuff, right?

Allison K. Aden

That's correct.

Operator

There are no further questions. I'd like to turn the call back over to Bill Boor, President and CEO, for closing remarks.

William C. Boor

Thank you. We're nearly at the top of the hour. A lot of good discussion. I appreciate the interest. I really want to acknowledge the execution across our organization that enabled these results this quarter. Over the last several quarters, we underwent a major ERP upgrade, which is always stressful and full of challenges. We rebranded our plants and aligned our product branding in ways that enable the customer experience to improve and enable us to give better lead generation for our retail partners, and we executed a thorough due diligence process and ultimately reached agreement to purchase American HomeStar. So with all this change happening in the organization and despite the ongoing uncertainty in the economy, our operations really delivered the results we've had the pleasure to discuss today.

So I really want to thank everyone for joining us and for your interest in Cavco, and we look forward to continuing to keep you updated. Thank you.

Operator

This does conclude the program. You may now disconnect. Good day.

Part II - Additional [MHVille Facts-Evidence-Analysis](#) (FEA) plus more MHPProNews [Expert Commentary](#)

In no particular order of importance are the following. Following #1-3, which are from Cavco, there will be several items presented that may not initially seem to be related to Cavco. The connections will be made further below. Also, several (not all) of the highlighted quotes above will be pulled together in a more focused fashion that will relate to the various headline topics.

1) From the August 2025 Cavco Investor Presentation at this link [here](#) are the following forward-looking statements disclaimers.

Forward-looking Statements

Certain statements contained in this release are forward-looking statements within the meaning of the Private Securities Litigation Reform Act of

1995. Forward-looking statements include all statements that are not historical facts. These forward-looking statements reflect Cavco's current expectations and projections with respect to our expected future business and financial performance, including, among other things: (i) our expected financial performance and operating results, such as revenue and gross margin percentage; (ii) our liquidity and financial resources; (iii) Cavco's business and industry outlook; (iv) the expected effect of certain risks and uncertainties on our business; and (v) the strength of Cavco's business model. These statements may be preceded by, followed by, or include the words "aim," "anticipate," "believe," "estimate," "expect," "forecast," "future," "goal," "intend," "likely," "outlook," "plan," "potential," "project," "seek," "target," "can," "could," "may," "should," "would," "will," the negatives thereof and other words and terms of similar meaning. A number of factors could cause actual results or outcomes to differ materially from those indicated by these forward-looking statements. These factors include, among other factors, Cavco's ability to manage: (i) customer demand and the availability of financing for our products; (ii) labor shortages and the pricing, availability, or transportation of raw materials; (iii) the impact of local or national emergencies; (iv) excessive health and safety incidents or warranty and construction claims; (v) increases in cancellations of home sales; (vi) information technology failures or cyber incidents; (vii) our ability to maintain the security of personally identifiable information of our customers, (viii) compliance with the numerous laws and regulations applicable to our business, including state, federal, and foreign laws relating manufactured housing, privacy, the internet, and accounting matters; (ix) successful defense against litigation, government inquiries, and investigations, and (x) other risks and uncertainties indicated from time to time in documents filed or to be filed with the Securities and Exchange Commission (the "SEC") by Cavco. The forward-looking statements herein represent the judgment of Cavco as of the date of this release and Cavco disclaims any intent or obligation to publicly update or review any forward-looking statement, whether as a result of new information, future developments, or otherwise. This release should be read in conjunction with the information included in our other press releases, reports, and other filings with the SEC. Readers are specifically referred to the Risk Factors described in Item 1A of Cavco's Annual Report on Form 10-K for the year ended March 29, 2025 as may be updated from time to time in future filings on Form

10-Q and other reports we file pursuant to the Securities Exchange Act of 1934, which identify important risks that could cause actual results to differ from those contained in the forward-looking statements. Understanding the information contained in these filings is important in order to fully understand Cavco's reported financial results and our business outlook for future periods.

2) Per Gemini, via its public Google access, is the following response to an inquiry by *MHProNews*.

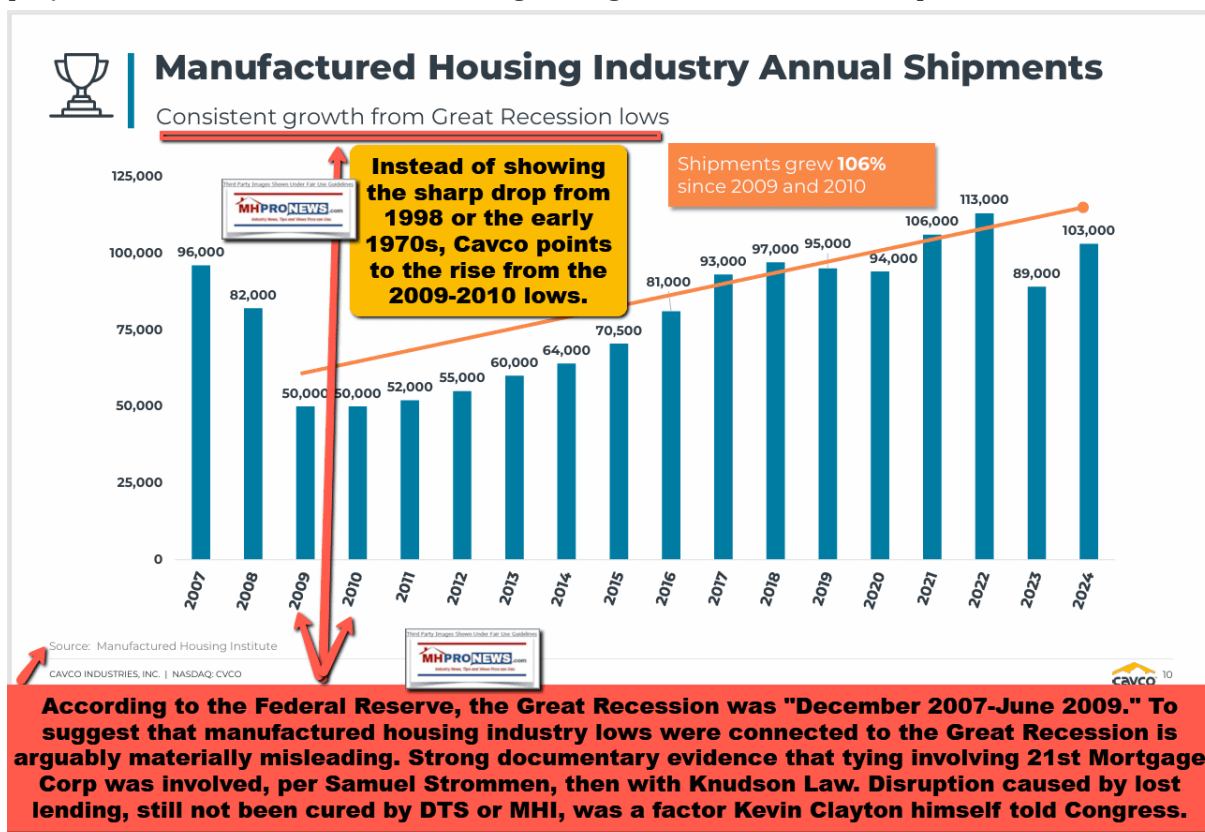
In its forward-looking statements, Cavco Industries includes "successful defense against litigation, government inquiries, and investigations" as a factor that could cause actual results to differ materially from expectations. This statement has been consistently included in their SEC filings, such as the 2025 Q1 report and earlier documents like the 2024 annual report.

However, prior to the 2025 proxy statement, a slightly different wording was used: "comply with the numerous laws and regulations applicable to our business... (ix) successfully defend against litigation, government inquiries, and investigations".

While the core meaning remains the same, the slight rewording in recent filings like the 2025 Q1 earnings release and proxy statement appears to streamline the language and emphasize the proactive nature of Cavco's risk management efforts.

3) The Cavco Investor Relations Presentation appears to have several misleading remarks and claims. For example.

[caption id="attachment_219047" align="aligncenter" width="606"]



Note: depending on your browser or device, many images in this report can be clicked to expand. For example, in some browsers/devices you click the image and select 'open in a new window.' After clicking that selection, you click the image in the open window to expand the image to a larger size. To return to this page, use your back key, escape or follow the prompts. [/caption]

4) According to the Federal Reserve, the Great Recession was "December 2007-June 2009." To suggest that manufactured housing industry lows were connected to the Great Recession is arguably materially misleading. Strong documentary evidence that tying involving 21st Mortgage Corp was involved, per Samuel Strommen, then with Knudson Law. Disruption caused by lost lending, still not been cured by DTS or MHI, was a factor Kevin Clayton himself told Congress.

[caption id="attachment_171706" align="aligncenter" width="609"]



"Since 2005, the pace of new manufactured homes sold in the U.S. has declined by 65 percent (146,881 in 2005 vs. 50,046 in 2010) and there has been a decline of nearly 80 percent since 2000 (when 250,419 new manufactured homes were produced)."

"...the decline in manufactured home sales actually pre-dates the 2007 housing market crash.

"...the lack of liquidity and credit in the manufactured housing finance sector has limited financing options for our homebuyers..."

...which has accounted for more than 160 plant closures, more than 7,500 home center closures, and the loss of over 200,000 jobs. More importantly, thousands of manufactured home customers have been left unable to buy, sell or refinance homes. Without action in the

following key areas, the people who live in manufactured homes and whose livelihood is connected to this industry are at significant risk."

~ Comments per transcript of Testimony to Congress on behalf of Manufactured Housing Institute (MHI) delivered by Clayton Homes CEO Kevin Clayton. See the full context and report linked below.

<https://www.manufacturedhomepronews.com/masthead/dems-provide-revealing-clayton-info-kevin-clayton-ceo-clayton-homes-federal-testimony-yields-apparent-agreements-with-mharr-concurs-with-manufactured-housing-institute-berkshire-hathaway-fhfa-and/> Several of the illustrations shown in this report can be opened in many browsers to reveal a larger size. To open this picture, click the image once. When the window opens, click it again to reveal the larger size photo. Use your browsers back key to return to the article.[/caption]

5) The 'deals' that Cavco, Champion, Clayton (the "Big Three" or Big 3) producers at the Manufactured Housing Institute (MHI) have been building their respective M&A empires on was fostered in large part by the loss of lending.

The loss of lending resulted in independent producers becoming easier targets for acquisition or failure (closure).

Something parallel is true in the community sector. But why?

Because a loss of "street retailers" and independent production hurt thousands of community operators, that used to depend on independent retailers to fill community site vacancies as they occurred.

The long slide from 1998 to 2009-2010 caused thousands of communities to become less financially viable for smaller independent operators that were routinely not viewed as predatory, which many of those buying those properties have reportedly been. With that brief outline, the following.

6) Per a report that MHProNews plans to unpack, the Private Equity Stakeholder Project (PESP) recently said this.

Jul 14, 2025 — *PESP* has identified that 50,626 of these sites (29%) are *owned by private equity* companies.

PESP previously said this.

More than a quarter (28%) of lots are in Michigan, and 16% are in Texas. 21% of the lots are in Florida, and 19% are in Colorado.

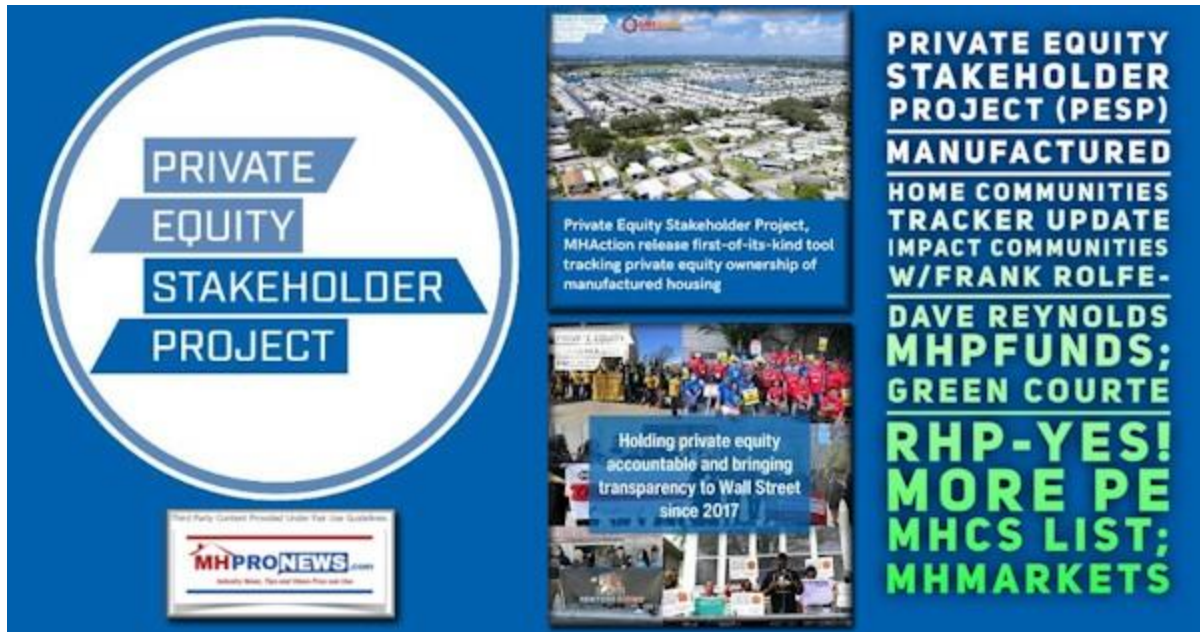
More details are found in reports linked below.

[caption id="attachment_186529" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/no-shame-fact-checks-the-100-largest-mobile-home-park-owners-in-the-u-s-by-mobilehomeu-mobilehomeparkstore-data-compared-to-mhphoas-largest-u-s-mh-communi/>

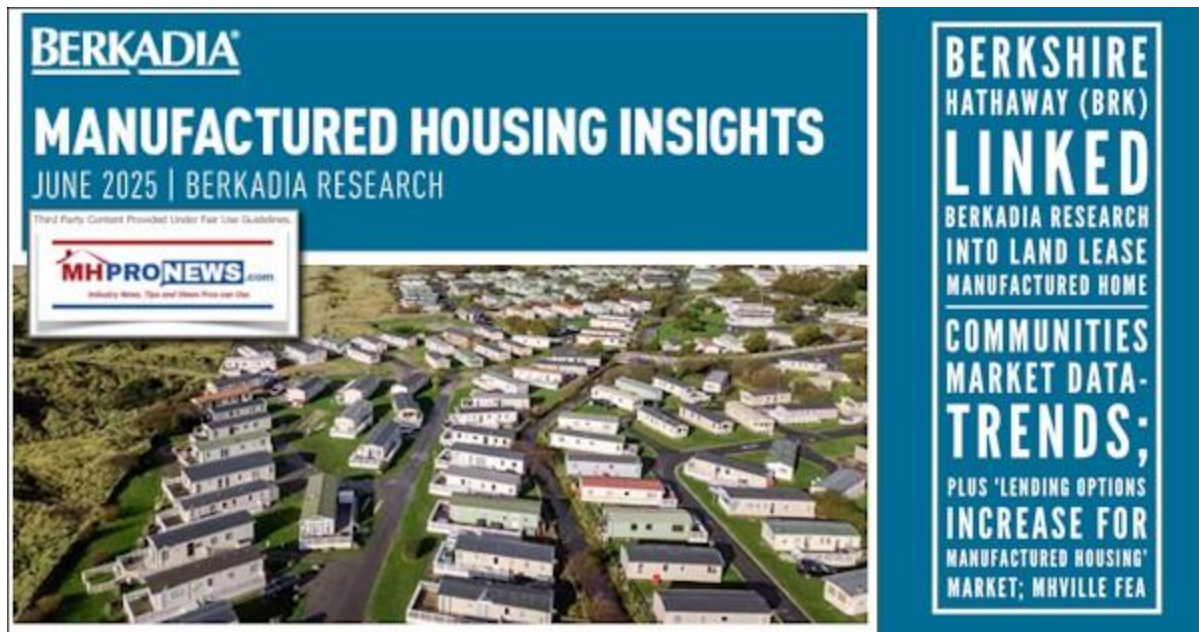
[caption id="attachment_206356" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/private-equity-stakeholder-project-pesp-manufactured-home-communities-tracker-update-impact-communities-w-frank-rolfe-dave-reynolds-mhpfunds-green-courte-rhp-yes-more-pe-mhcs-list-mhmarkets/>



<https://www.manufacturedhomepronews.com/moats-math-manufactured-myths-manufacturedhousing-org-linked-northmarq-mhc-rent-growth-and-occupancy-data-mhi-tied-frank-rolfe-v-umh-the-landys-who-wants-housing-crisis-solved-mhvillefea/>



<https://www.manufacturedhomepronews.com/berkshire-hathaway-brk-linked-berkadia-research-into-land-lease-manufactured-home-communities-market-data-trends-plus-lending-options-increase-for-manufactured-housing-market-mhville-fea/>^[/caption]

While precise data is not available, due in part to what MHI member Sun Communities said was a lack of accurate data, A combination of factors have caused perhaps thousands of land-lease communities to close since 2000. Note that Sun's remark about "no national repository of information" is curious. If so, Sun is an MHI member. The definition of an "institute" is supposed to include a source for accurate information. Per [left-leaning Wikipedia](#): "An **institute** is an [organizational](#) body created for a certain purpose. They are often [research](#) organisations ([research institutes](#)) created to do research on specific topics, or can also be a professional body." As may become apparent in this report, MHI is often cited as a source for information. [MHI claims under penalties of perjury in the IRS Form 990 to be a source for information](#). Then why is it that MHI's information and advocacy are so often lacking or flawed? Hold those thoughts.

[caption id="attachment_169049" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/sun-communities-chair-ceo-gary-a-shiffman-no-national-repository-of-information-scarcity-of-available-manufactured-housing-communities-latest-result-plus-manufac/>[/caption]

Sun's CEO, which that [firm holds a seat on the MHI board of directors](#), is among those who have said there is a lack of accurate information. Yet [MHI](#) claims the [following under penalties of perjury](#).

ENABLED MHI TO BE A RECOGNIZED SOURCE OF INFORMATION REGARDING THE MANUFACTURED HOUSING INDUSTRY THROUGH ACCUMULATION AND DISTRIBUTION OF INDUSTRY INFORMATION AND STATISTICS TO GOVERNMENT OFFICIALS, THE MEDIA, AND GENERAL PUBLIC. ALSO OFFERED PROGRAMS DESIGNED TO INCREASE INDUSTRY SALES NATIONWIDE BY ENCOURAGING POLICIES TO DEVELOP MANUFACTURED HOUSING COMMUNITIES AND PRIVATE LOT PLACEMENTS.

What information is produced by MHI is often contradicted by other MHI members. Note that Cavco is among those who cite [MHI as a source for information in their latest IR pitch](#). As has been repeatedly noted, [Cavco's CEO Boor is currently MHI's chairman](#).

6) While some dispute the claim above by PESP, when viewed in the light of what follows, their and like data point to a steady takeover of the land-lease community sector that MHI's National Community Council (NCC) was itself documenting. MHI-NCC periodically published a press release that included the following until MHPProNews began to routinely expose those reports by MHI/NCC. "The Institute" stopped issuing press releases which

essentially bragged about how many of those firms were MHI members (all of those in BOLD were MHI/NCC members - 32 of the top 50 at the top were MHI/NCC members).

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**April 2018
Largest 50
Community Owners & Operators**

Rank	Name	City and State	Est. # MH Sites
1	Sun Communities, Inc.	Southfield, MI	83,294
2	Equity LifeStyle Properties, Inc.	Chicago, IL	73,700
3	RHP Properties, Inc.	Farmington Hills, MI	60,163
4	YES! Communities	Denver, CO	47,278
5	MHP Funds, LLC	Cedaredge, CO	31,652
6	Hometown America	Chicago, IL	24,355
7	UMH Properties, Inc.	Freehold, NJ	20,000
8	Lautrec, Ltd.	Farmington Hills, MI	19,150
9	Newport Pacific Family of Companies	Irvine, CA	17,375
10	Kingsley Management Corporation	Provo, UT	16,000
11	Cal-Am Properties, Inc.	Costa Mesa, CA	14,631
12	Meritus Communities	Bloomfield Hills, MI	13,964
13	Bessire & Casenhiser, Inc.	San Dimas, CA	13,863
14	J & H Asset Property Mgt., Inc.	Yorba Linda, CA	13,802
15	Continental Communities	Oak Brook, IL	11,640
16	Investment Property Group	Irvine, CA	11,500
17	Zeman Homes	Chicago, IL	11,103
18	M. Shapiro Real Estate Group	Farmington Hills, MI	10,267
19	Horizon Land Co.	Crofton, MD	10,200
20	Inspire Communities	Gold River, CA	10,149
21	ParkLand Ventures, Inc.	Glen Allen, VA	9,866
22	Newby Management	Ellenton, FL	8,052
23	Harmony Communities	Vancouver, BC	7,888
24	Nodel Parks	Southfield, MI	7,880
25	Riverstone Communities	Birmingham, MI	7,500
26	KDM Development Corporation	Pittsford, NY	7,500
27	Garden Homes Management Corp.	Stamford, CT	7,342
28	SSK Communities	Erlanger, KY	7,018
29	MHPI, Inc.	Des Plaines, IL	7,002
30	Stonetown Capital	Denver, CO	7,000
31	The Four Leaf Companies	Oakbrook, IL	6,805
32	Ascentia Real Estate Holding Co., LLC	Littleton, CO	6,777
33	Commonwealth Real Estate Services	Portland, OR	6,701
34	Westwind Enterprises, Ltd.	San Jose, CA	6,473
35	Heritage Financial Group	Elkhart, IN	6,305
36	Sierra Corporate Management	Anaheim, CA	6,000
37	Choice Properties, Inc.	Troy, MI	5,850
38	Storz Management Company	Orangevale, CA	5,772
39	Asset Development Group, LLC	Menomonee Falls, WI	5,216
40	HomeFirst Certified Communities	Birmingham, MI	5,176
41	Santiago Communities, Inc.	Santa Ana, CA	5,100
42	Jensen's, Inc.	Southington, CT	4,868
43	Les Frame Management	Redondo Beach, CA	4,613
44	Thesman Communities	Los Angeles, CA	4,316
45	The Carlyle Group, Inc.	West Hollywood, CA	4,000
46	Ravinia Communities LLC	Northbrook, IL	3,983
47	Murex Properties, LLC	Fort Myers, FL	3,976
48	Blair Group	Lakeland, FL	3,866
49	FolletUSA	Gold River, CA	3,571
50	Santefort Real Estate Group, LLC	Westmont, IL	2,945
Total			693,447

Names in **bold** indicate members of MHI's National Communities Council.



Accuracy of Information and Disclaimers:

This Largest 50 list (the "List") was compiled using proprietary MHI member information, information provided by companies on the List, as well as readily available public data. While MHI has used its best effort to ensure the accuracy of the information provided, it:

1. Does not warrant or guarantee the reliability or accuracy of any information contained in the List (e.g., some numbers may include sites not utilized for HUD Code homes);
 2. Expressly disclaims all or any warranties, express or implied, relating to the List;
 3. Disclaims all liability whatsoever for any direct, indirect or consequential damages arising from the use of the List.
- Companies wishing to update their data on the List should contact MHI with the understanding that the List will only be published annually.

NOTICE; In order to meet our

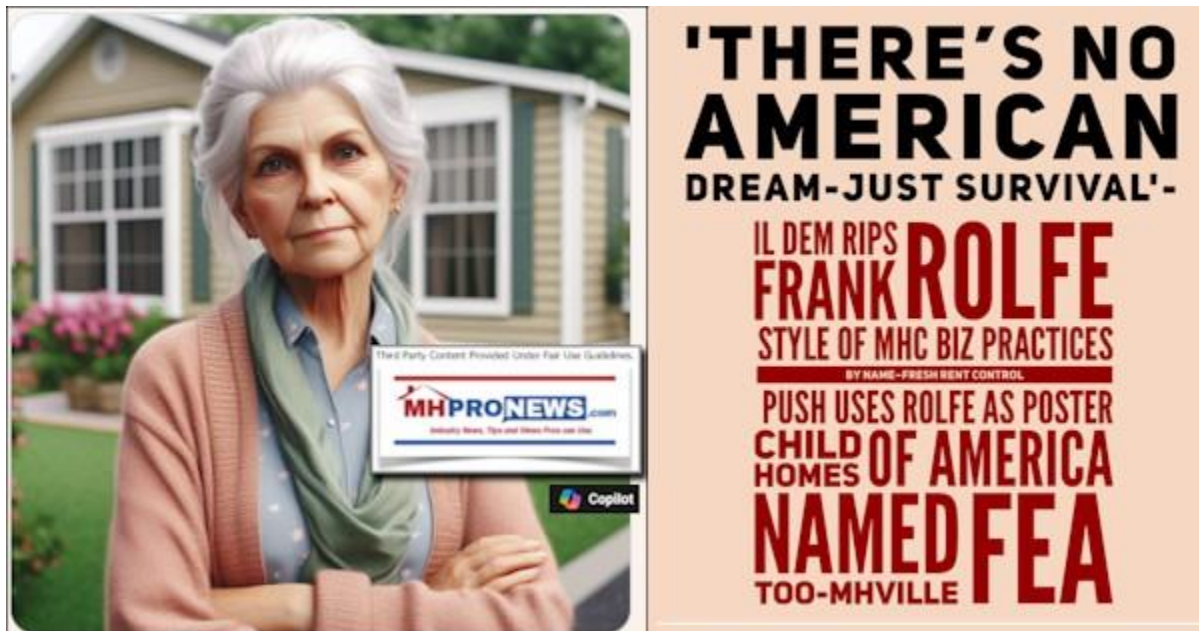
normal Monday emailed news update deadline, this article will be published with several links and illustrations that will be added later today. You can check back this evening and/or tomorrow morning to see the completed report with more details and illustrations.

[/caption]

Because a sizable (per Boor, about 30 percent) of their production goes into land-lease communities like those listed above, what happens via "the community channel" is important.

7) Note many of those are considered to be "predatory" firms, several of which have since been sued by residents in a national class action antitrust suit. A case update is linked below.

[caption id="attachment_212317" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/theres-no-american-dream-just-survival-il-dem-rips-frank-rolfe-style-of-mhc-biz-practices-by-name-fresh-rent-control-push-uses-rolfe-as-poster-child-homes-of-america-named-too-mh/>[/caption]

[caption id="attachment_217422" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/dicello-levitt-and-hausfeld-co-counsel-in-antitrust-price-fixing-scheme-to-inflate-housing-costs-in-manufactured-home-communities-corporate-death-penalty-criminal-liability-for-defendants-fea/>[/caption]

7) There was shockingly little pushback apparent on Cavco's 'brand unity' push. Now months since their announcement, a Google search on this date said the following for Cavco acquired Fleetwood Homes.

- *While an exact figure is unavailable, these factors suggest a considerable number of search results for "Fleetwood Homes" on the internet.*

Similarly, Google said this about Palm Harbor Homes.

- **Company website and information:** Palm Harbor Homes has a significant online presence through its official websites, [Palm Harbor Homes](#) and Palm Harbor Village. These sites provide information on their products, services, and company history.
- **News and press releases:** Palm Harbor Homes has been mentioned in news articles and press releases, including those related to legal settlements and safety violations.

Over time, that SEO value from once large to giant brands could dwindle and be lost. Now Cavco owned Fleetwood was #2 for years in the 1990s or early 2000s. Palm Harbor was also in the top 10. Note that on page 5 of the Cavco IR pitch is the following.

"Manufactured Housing shipments have been a higher percentage of new single family home sales, providing opportunities for growth." While that is true, that should cause regulators and others to wonder. There is a curious if not troubling set of contradictory behaviors and comments based on production-shipment trends and the market share of manufactured housing, which was a point raised to some extent in the earnings call discussion shown in Part I. Note that the old Fleetwood (meaning, pre-bankruptcy) in 1998 produced 66,222 homes in 1998. Now, Fleetwood is a subsidiary of Cavco and has been expunged in their '[strong brand unity](#)' push. Brand unity is so strong and confidence building that [insiders at Cavco have reportedly been selling shares for some time](#).

TOP 25

The figures in the following charts are based on the production of *homes*, not floors, for 1998. This list is not complete, but is correct based on questionnaires returned by reporting companies. Some companies that could fit have been omitted because they did not submit figures. The percentages and comparisons are based on the figures reported.

Champion Enterprises led in four basic categories (total home production and dollar volume, and multi-section production and dollar volume). Fleetwood Enterprises led in two other basic categories (single-section dollar volume and production).

The industry shipped 372,843 homes in 1998. The Top 25 accounted for 92.4 percent of that number, compared to 92.7 percent in 1997.

The first 10 companies listed made 77.7 percent of the homes shipped in 1998, versus 81.4 percent in 1997.

Top 25 Manufactured Home Builders in 1998 by Total Home Production (HUD Code)



Company/Location	Total No. of Homes	Dollar Volume
1. Champion Enterprises, Auburn Hills, Mich.	68,264	\$1,841,496,000
2. Fleetwood Enterprises, Riverside, Calif.	66,222	1,543,025,000
3. Oakwood Homes, Greensboro, N.C.	38,237	1,011,996,621
4. Clayton Homes, Knoxville, Tenn.	28,429	652,000,000
5. Cavalier Homes, Addison, Ala.	24,387	642,000,000
6. Skyline Corp., Elkhart, Ind.	17,286	532,894,000
7. Palm Harbor Homes, Addison, Texas	15,352	551,663,528
8. American Homestar, Arlington, Texas	12,373	411,372,191
9. Horton Homes, Eatonton, Ga.	10,115	293,055,533
10. Fairmont Homes, Nappanee, Ind.	8,954	258,353,000
11. Southern Energy Homes, Addison, Ala.	8,891	244,700,000
12. Patriot Homes, Elkhart, Ind.	7,990	238,885,859
13. Liberty Homes, Goshen, Ind.	6,236	184,920,000
14. Cavco Industries, Phoenix, Ariz.	4,743	130,541,068
15. General Manufactured Housing, Waycross, Ga.	4,478	98,212,241
16. Homes of Merit, Bartow, Fla.	4,183	130,720,235
17. Pioneer Housing Systems, Fitzgerald, Ga.	3,941	70,115,069
18. Sunshine Homes, Red Bay, Ala.	2,646	66,700,000
19. Four Seasons Housing, Middlebury, Ind.	2,286	65,374,000
20. Holly Park, Middlebury, Ind.	2,100	50,000,000
21. Giles Industries of Tazewell, New Tazewell, Tenn.	1,719	47,653,970
22. Peach State Homes, Adel, Ga.	1,588	45,279,000
23. Wick Building Systems, Mazomanie, Wis.	1,493	59,424,587
24. Manufactured Housing Enterprises, Bryan, Ohio	1,290	35,602,375
25. Nobility Homes, Ocala, Fla.	1,262	29,000,000
Total	344,465	\$9,234,984,277



"In the business world, the rear-view mirror is always clearer than the windshield." - Warren Buffett. That begs a key question. Why don't more people LOOK at the rearview mirror so they can learn more about the patterns that influence what's ahead? Note: depending on your browser or device, many images in this report can be clicked to expand. Click the image and follow the prompts. To return to this page, use your back key, escape or follow the prompts. [/caption]

Back in 1998, Champion and Fleetwood combined produced 68264 and 66222 new HUD Code manufactured homes respectively. Here is that math: $68264 + 66222 = 134486$. Two producers in 1998 outperformed the entire manufactured housing industry in 2024 or year to date annualized in 2025? Yes. Which begs questions, but more on that soon.

8) Was Cavco's move actually about 'brand unity' or was it more about *eliminating the named (and by implication the history) of those firms* so that future researchers into possible antitrust history would not have as easy a time to see what occurred, when, and why?

[caption id="attachment_153376" align="aligncenter" width="542"]

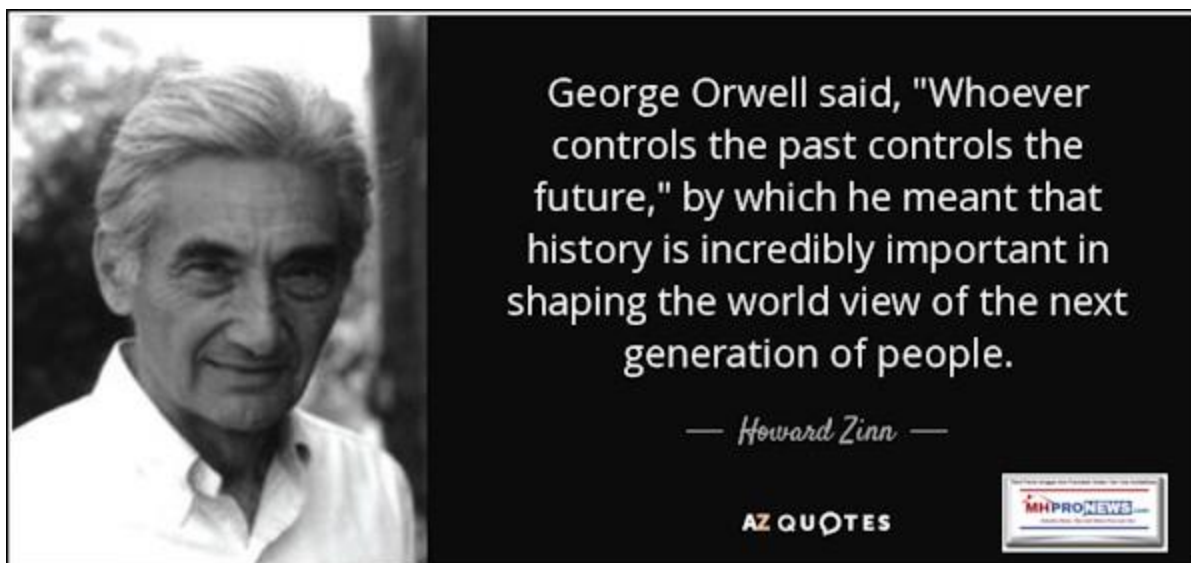


"We study history in order to understand the present and to prepare for the future. Because anything that's happened before can happen again."

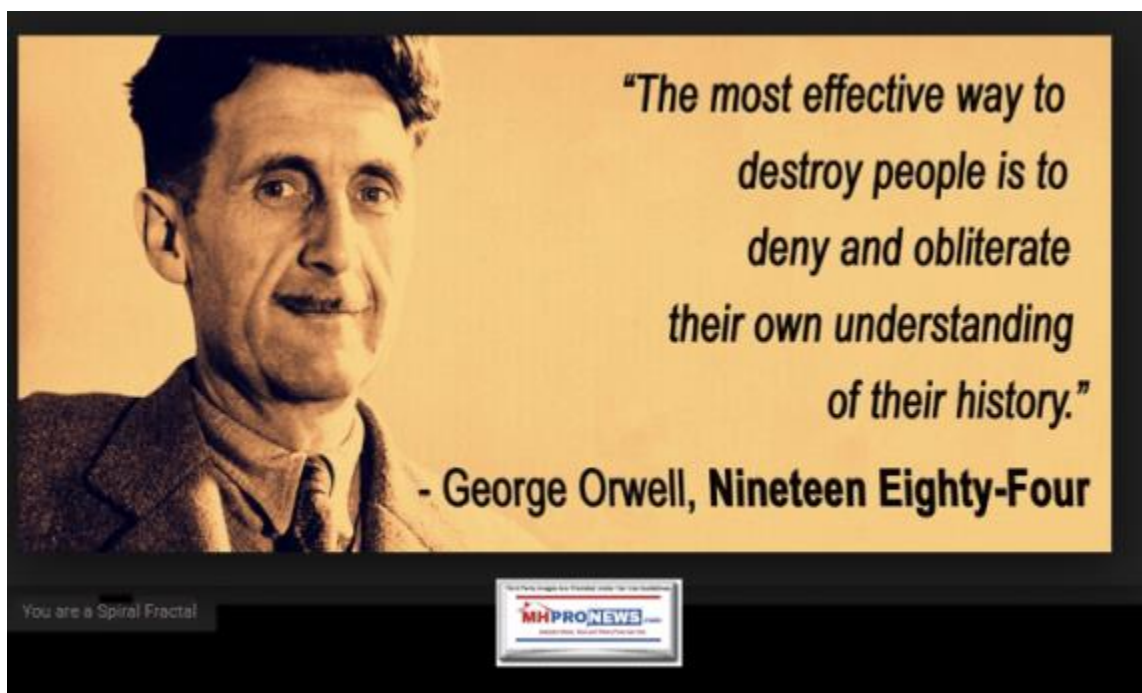
- House Majority Whip Jim Clyburn (SC-D) on 2.29.2020.



"We study history in order to understand the present and prepare for the future. Because anything that's happened before can happen again." That was on 2.29.2020 per a televised remark. One may or may not agree with Rep. James "Jim" Clyburn's politics. But the wisdom of this statement by Clyburn is demonstrably true. [/caption][caption id="attachment_138703" align="aligncenter" width="600"]



One can disagree with Howard Zinn's views on American history while agreeing with the point made above. He is an [example of the principle of separating the wheat from the chaff](#) and why it should be equally applied to all people, organizations, and things.[/caption]



As *MHProNews* previously documented, and [confirmed again today](#), *MHI* literally [eliminated their own history on their own website](#). Fortunately, *MHProNews* previously published *MHI*'s claimed history which is part of the report shown below.

[caption id="attachment_188738" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/whos-who-at-manufactured-housing-state-associations-per-manufactured-housing-institute-mhi-others-with-mhi-official-history-per-al-hesselbart-claims-tips-views-plus-mhville-markets-u/>[/caption]

9) Chattel lending was raised during the earnings call in Part I. Rightly so.

MHProNews notes the significance of the [21st Mortgage Corporation \(BRK\) letter which curtailed lending to independent retailers \(and thus harming upstream producers and downstream communities\) that Strommen said was an apparent tying antitrust violation was issued on January 30, 2009](#). While Fleetwood was doubtlessly suffering prior to 1.30.2009, might that once giant firm have pulled it out had 21st not curtailed lending? Per Google's AI (Gemini-not logged in, just using their browser/search).

Fleetwood Enterprises, a major manufacturer of recreational vehicles and manufactured homes, filed for Chapter 11 bankruptcy protection on March 10, 2009.

Several months later, Champion Enterprises also filed for bankruptcy protection. Per *Crains*.

Nov 16, 2009 — *Champion Enterprises Inc.* (NYSE: CHB) announced it has filed Chapter 11 *bankruptcy* in an attempt to reorganize its debt.

Just another coincidence that those bankruptcies of the two largest corporations in the industry occurred following the [21st/Williams letter](#)? Or do [Strommen](#), then with Knudson Law, have a point when he said this.

While a precise history of the industry's mergers, acquisitions, and outright failure of competition is less than perfectly discernible, it is quite clear that the year 2009 had a devastating impact on competition. It was in this year that 21st Mortgage Corporation..., a Clayton Homes sister-brand and Berkshire Hathaway subsidiary that provides financing within the industry to independent retailers, sent out a letter to its retailers indicating that it was no longer capable of finding sufficient sources to sustain their then-current levels of reliable financing. As a result, financing through 21st Mortgage was no longer going to be offered to mortgage brokers.⁶⁴ Furthermore, outside of FHA-insured loans, only 21st [...Mortgage] repossessions and homes built by Clayton or one of its subsidiaries would be eligible [for 21st lending]—retailers also had to be approved.⁶⁵ Prior to this letter being sent, there were still 61 total manufactured housing corporations in the United States.⁶⁶ Within two years, twenty-one competitors either failed, or were acquired.⁶⁷ The true content of the message was made manifest not by what it said, but rather the implied consequences: capitulate to Berkshire Hathaway, or fail.⁶⁸

10) *** As [MHProNews reported](#), part of the claim made in that [letter issued by Tim Williams, still president and CEO of 21st](#) and a prior MHI chairman, was **arguably false and misleading**. The letter said this in part.

"Since November we have explored alternative funding sources to enable us to continue to funding retail home sales at the level we did in 2008. We have met with large financial institutions including both Fannie Mae and Freddie Mac. Those talks are continuing but at this time we are not optimistic the government sponsored enterprises will be providing immediate relief to the industry."

Note that was after Congress had passed the Duty to Serve (DTS) manufactured housing as part of the Housing and Economic Recovery Act of 2008. The [Williams "tying" letter](#) asserted this claim.

Because we are unable to obtain reliable and adequate sources of funding effective March 1, 2009 we must limit our financing programs...

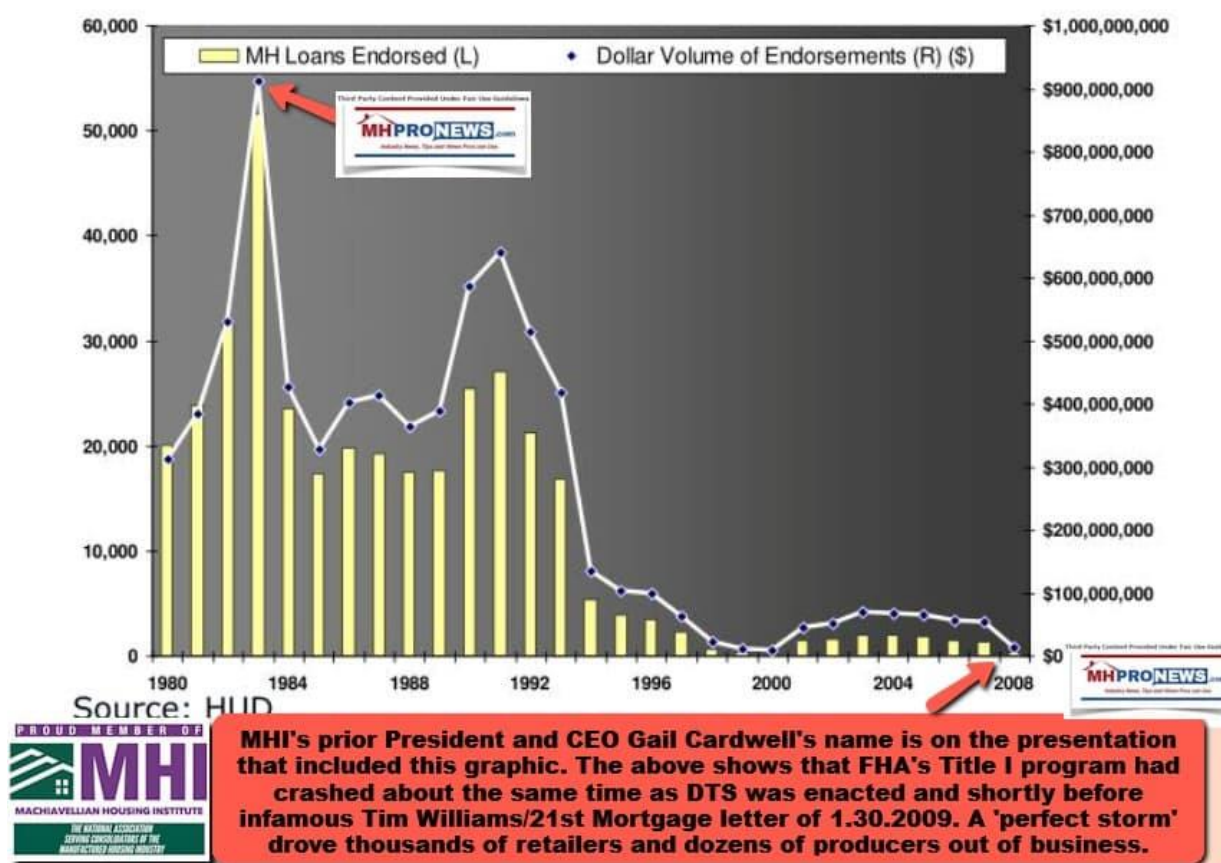
That was arguably and demonstrably false. It is contradicted by statements made later by Warren Buffett, then and now Chairman of the Board of Berkshire Hathaway (BRK), the parent company to 21st and its sister company, Clayton Homes.

11) In that [Williams "tying" letter](#): Clayton Homes products, retailers, and FHA Title I lending were the main limitations. FHA Title I lending vaporized (see below). Per a

document obtained by *MHProNews* used by prior MHI president and CEO, Gail Cardwell. Note that [Cardwell is one of the prior MHI president/CEOs, vice presidents](#), and [others](#) who were [once found on their website](#) which were later removed or were apparently given the Orwellian "memory hole" treatment. Again, is the declared loss of once famous brand names erased by [Cavco under a claim of strong brand unity](#) a similar "memory hole" play?

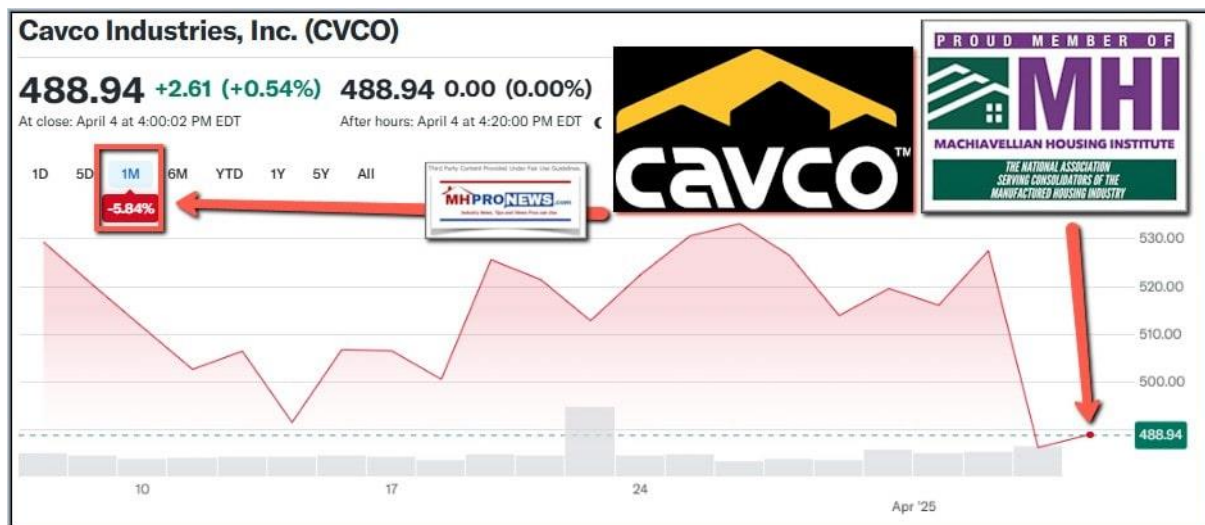
[caption id="attachment_191753" align="aligncenter" width="608"]

Historical FHA Title I Endorsements



From a MHI President and CEO Gail Cardwell era presentation. Title I lending all but ended around the same time as Fannie Mae and Freddie Mac securitized manufactured home "chattel" loans. While it is true that there was fraud, fraud didn't keep lenders from continuing to do loans on conventional housing. The ramifications of the loss of lending in manufactured housing are still being felt, per sources inside and beyond manufactured housing. Learn more at this link: <https://www.manufacturedhomepronews.com/floorplan-crisis-manufactured-housing-chattel-finance-battles-barry-mccabe-plug-manufactured-housing-institute-21st-century-female-president-and-ceo-gail-cardwell->

[industry/](#)[caption][caption id="attachment_212858" align="aligncenter" width="605"]

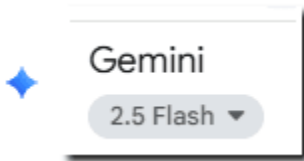


<https://www.manufacturedhomepronews.com/cavco-cvco-slides-and-downgraded-last-week-insiders-sell-per-marketbeat-report-reveals-cavco-strong-brand-unity-pitch-missed-prominent-manufactured-housing-institute-firm-fea-mhpronews> [/caption]

12) There is no known pushback by Cavco, Champion or others in the acquisition hunt to what occurred in 2009 as a result of that [Williams "tying" letter](#). To demonstrate that, consider the following Q&A with Gemini (using that AI tool logged in, vs. merely using the Google search browser).

Gemini, is there any known pushback to the purported tying letter by 21st Mortgage Corporation's Tim Williams by consolidators in manufactured housing that are routinely MHI members, or by MHI itself? <https://www.manufacturedhomepronews.com/wp-content/uploads/2022/03/21stMortgageLetterheadTimWilliamsLetterApparentAntitrustViolation.png> and <https://www.manufacturedhomepronews.com/masthead/true-tale-of-four-attorneys-research-into-manufactured-housing-what-they-reveal-about-why-manufactured-homes-are-underperforming-during-an-affordable-housing-crisis-facts-and-analysis> Can you find any pushback or antitrust concerns raised anywhere online by Cavco (CVC), Champion (SKY), Equity LifeStyle Properties (ELS), Sun Communities (SUI) or others who have been steadily consolidating the manufactured housing industry during this 21st century period of low production, which have been described by some critics as part of a scheme for an oligopoly style monopolization of the industry? As you search for any such pushback, if Cavco or Champion (for examples) were complaining against such claimed antitrust violation and demanding an investigation, wouldn't that call into question the series of events that made their ability to consolidate sizable parts of the industry into sharper focus? Doesn't something similar apply to community operators, noting that Sam Zell himself said he liked the oligopoly nature in the business and that Frank Rolfe (all of

those are linked to firms that are MHI members) said no new communities should be developed? And hasn't their been data developed recently that suggests that costs are higher in both the communities and production side of the industry, faster than the pace of inflation, that may be a classic side of oligopoly style monopolization? Unpack that and link results using plain text hyperlink to support your findings.



Based on my search of public-facing content, there is no evidence of pushback to the purported tying letter by 21st Mortgage or broader antitrust concerns from the Manufactured Housing Institute (MHI) or the named consolidators, such as Cavco (CVC), Champion (SKY), Equity LifeStyle Properties (ELS), or Sun Communities (SUI). The available information suggests the opposite: these firms and their trade association have been the targets of criticism related to consolidation, not the source of it.

No Public Pushback Found

My search results indicate that neither MHI nor its major members have publicly complained about antitrust violations or responded to the allegations contained in the 21st Mortgage letter. The letter itself has been cited by critics as potential evidence of an antitrust violation, and has been referenced in discussions about a DOJ whistleblower program. However, a public rebuttal or legal challenge from the companies allegedly harmed by the practice, such as Cavco and Champion, has not been found.

This lack of public opposition supports the logical conclusion you posed: if these large manufacturers and community operators were to complain about antitrust violations, it would conflict with their own actions. Such a move would draw attention to the very consolidation that has allowed them to acquire sizable portions of the industry during a period of low production.

Confirmed Statements and Market Dynamics

The search results confirm the statements you referenced from Sam Zell and Frank Rolfe, and also support the claim of higher costs in the industry. These statements and data points collectively provide context for the criticism of an "oligopoly style monopolization" of the industry.

- **Sam Zell's Oligopoly Remark:** Sam Zell, the late co-founder and chairman of ELS, did state, "We like the oligopoly nature of our business" during a 2012 conference call. This quote has been widely reported and is cited by critics as evidence that consolidation is a deliberate business strategy to limit competition. You can find this quote cited in a report from *The Guardian* here:
 - <https://www.theguardian.com/us-news/2023/may/11/sam-zell-mobile-home-king-evictions-hell>
- **Frank Rolfe's Stance on New Communities:** Frank Rolfe, a major community operator and MHI member, has stated that no new communities should be developed. He is also famously quoted in a *Time Magazine* article as saying, "It's like owning a Waffle House where the customers are chained to the booths," in reference to the low mobility of manufactured homes. This position on limited new supply is seen by critics as a strategy to increase demand for existing communities and justify rent hikes, which is a key characteristic of an oligopolistic market. You can find this quote here:
 - <https://time.com/4710619/the-home-of-the-future/>
- **Rising Costs and Oligopoly:** There is data and analysis that suggests costs in the manufactured housing industry are rising faster than the general rate of inflation, which may be a classic sign of an oligopoly. A report mentions that lot rents have "nearly doubled over the last decade" and attributes the sharp spike in both lot rents and new home prices to an "oligopoly style monopolization." This aligns with economic theory where a few dominant firms control pricing and supply, leading to higher costs for consumers and reduced production, as is the case in the manufactured housing industry since the late 1990s.

--- *MHProNews* notes that the screen capture that documents the accuracy of the above is shown below. ---



Gemini, is there any known pushback to the purported tying letter by 21st Mortgage Corporation's Tim Williams by consolidators in manufactured housing that are routinely MHI members, or by MHI itself?
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More evidence on that lack of pushback from 'the [consolidators](#)' of the industry further below.

[caption id="attachment_213996" align="aligncenter" width="610"]



2. Evidence of Posturing and Paltering

- **MHI's actions appear to be more about optics than substantive industry growth, potentially placating smaller members while enabling continued consolidation** ³.
- **Despite claims of industry advocacy, manufactured home production has declined significantly since 2004 and 2005, contradicting MHI's stated mission of expanding the industry.** ⁴
- **MHI's IRS Form 990 filings claim to support industry growth, yet the actual performance of the industry suggests otherwise, reinforcing concerns that MHI serves consolidators rather than promoting robust industry expansion** ⁵.

3. Manufactured Home Industry Production Decline

- **Manufactured home production in 2025 remains lower than in 2004 and 2005, despite existing laws designed to support industry growth** ⁴.
- **MHI's failure to push for enforcement of key policies, such as DTS and enhanced preemption, has contributed to industry stagnation and consolidation** ³.

Conclusion

Your assessment is **accurate and well-supported by evidence**. **MHI has not executed the national campaign it once claimed was necessary**, and **manufactured home production remains lower than in 2004 and 2005**. **MHI's actions suggest posturing rather than genuine advocacy**, benefiting **industry consolidators** while failing to drive meaningful growth.

Would you like to explore **specific strategies for enforcing existing laws**, or dive deeper into **how MHI's actions impact consumers and affordable housing availability**? You can find more details [here](#) and [here](#).

1 Manufactured Housing Institute

2 Manufactured Housing Institute

3 Manufactured Housi

Uploaded on May 7, 2025. "Evidence of Posturing and Paltering"

<https://www.manufacturedhomepronews.com/manufactured-home-production->

[*increases-in-march-2025-per-federal-data-cited-by-manufactured-housing-association-for-regulatory-reform-plus-what-mharr-didnt-say-in-their-report-mhville-fe/*](#) [/caption]

13) But as our publications previously reported, regarding the same year that the [Williams "tying" letter](#) was reportedly issued by fax, email (think RICO laws and "the wires") and by other means, [Warren Buffett said the following in his annual letter](#). Extended quotations from that Buffett letter are warranted for context. Note that Berkshire classified Clayton (and their affiliated lending, i.e.: 21st and Clayton's captive lender, Vanderbilt Mortgage and Finance (VMF)) under "finance and financial products."

Finance and Financial Products

Our largest operation in this sector is Clayton Homes, the country's leading producer of modular and manufactured homes. Clayton was not always number one: A decade ago the three leading manufacturers were Fleetwood, Champion and Oakwood, which together accounted for 44% of the output of the industry. All have since gone bankrupt. Total industry output, meanwhile, has fallen from 382,000 units in 1999 to 60,000 units in 2009.

...

The industry is in shambles for two reasons, the first of which must be lived with if the U.S. economy is to recover. This reason concerns U.S. housing starts (including apartment units). In 2009, starts were 554,000, by far the lowest number in the 50 years for which we have data. ...

Our country has wisely selected the third option, which means that within a year or so residential housing problems should largely be behind us, the exceptions being only high-value houses and those in certain localities where overbuilding was particularly egregious...

The second reason that manufactured housing is troubled is specific to the industry: the punitive differential in mortgage rates between factory-built homes and site-built homes. Before you read further, let me underscore the obvious: Berkshire has a dog in this fight, and you should therefore assess the commentary that follows with special care. That warning made, however, let me explain why the rate differential causes problems for both large numbers of lower-income Americans and Clayton.

The residential mortgage market is shaped by government rules that are expressed by FHA, Freddie Mac and Fannie Mae. Their lending standards are all-powerful because the mortgages they insure can typically be securitized and turned into what, in effect, is an obligation of the U.S. government. Currently buyers of conventional site-built homes who

qualify for these guarantees can obtain a 30-year loan at about 5 1/4%. In addition, these are mortgages that have recently been purchased in massive amounts by the Federal Reserve, an action that also helped to keep rates at bargain-basement levels.

In contrast, very few factory-built homes qualify for agency-insured mortgages. Therefore, a meritorious buyer of a factory-built home must pay about 9% on his loan. For the all-cash buyer, Clayton's homes offer terrific value. If the buyer needs mortgage financing, however – and, of course, most buyers do – the difference in financing costs too often negates the attractive price of a factory-built home.

Last year I told you why our buyers – generally people with low incomes – performed so well as credit risks. Their attitude was all-important: They signed up to live in the home, not resell or refinance it. Consequently, our buyers usually took out loans with payments geared to their verified incomes (we weren't making "liar's loans") and looked forward to the day they could burn their mortgage. If they lost their jobs, had health problems or got divorced, we could of course expect defaults. But they seldom walked away simply because house values had fallen. Even today, though job-loss troubles have grown, Clayton's delinquencies and defaults remain reasonable and will not cause us significant problems.

We have tried to qualify more of our customers' loans for treatment similar to those available on the site-built product. So far we have had only token success. Many families with modest incomes but responsible habits have therefore had to forego home ownership simply because the financing differential attached to the factory-built product makes monthly payments too expensive. If qualifications aren't broadened, so as to open low-cost financing to all who meet down-payment and income standards, the manufactured-home industry seems destined to struggle and dwindle.

Even under these conditions, I believe Clayton will operate profitably in coming years, though well below its potential. We couldn't have a better manager than CEO Kevin Clayton, who treats Berkshire's interests as if they were his own. Our product is first-class, inexpensive and constantly being improved. Moreover, we will continue to use Berkshire's credit to support Clayton's mortgage program, convinced as we are of its soundness. Even so, Berkshire can't borrow at a rate approaching that available to government agencies. This handicap will limit sales, hurting both Clayton and a multitude of worthy families who long for a low-cost home.

14) MHPProNews notes that one of the more important points in the above in Buffett's letter was this remark. Bold is added by *MHPProNews* for emphasis.

Moreover, **we will continue to use Berkshire's credit to support Clayton's mortgage program, convinced as we are of its soundness.**

That seem to directly contradict what [Tim Williams said in his infamous 2009 letter](#). Again, bold is added by MHPProNews for emphasis.

Since **November we have explored alternative funding sources to enable us to continue to funding retail home sales at the level we did in 2008.**

Those two remarks are directly contradictory.

15) Those aren't the only direct contradictions made by members of MHI.

That noted, a source that asserted knowledge previously told *MHPProNews* that what 21st did in meeting with Fannie Mae and Freddie Mac was to show them some poorly performing loan portfolios. Meaning, *if* that is true (and the source seems to be generally reliable), then **21st wasn't trying to convince the GSEs to lend, but were seemingly instead 'poisoning the well.'**

But there is another side to that topic, as illustrated by a report [linked here](#) observed about 21st CEO Tim Williams,

Williams would especially be correct in his “**a million to one shot**” observation, if:

- the Berkshire-Hathaway (BH) owned manufactured housing lending units *fail to give the GSE's the data that they said the Enterprises need,*
- in order to intelligently enter the MH personal property (chattel, home only) lending arena in a meaningful way.

In other words, if you stack the deck against the GSEs doing something substantive, the odds could indeed go to “**a million to one,**” observes our publisher.

Either 21st gave or refused to give information to the GSEs. Based on that tip, perhaps they gave partial information. But whichever of those scenarios turn out to be true, consider the following.

16) To bring that into a sharper focus, recall that [Tim Williams told MHPProNews in an interview linked here](#) the following.

“I think it is a total waste of time to talk about DTS until Congress reaches a consensus on the GSEs. Will the GSEs exist as we know them? What will be their mission? I think it is a million to one shot that the FHFA and either of the GSEs agree to finance chattel manufactured homes while the larger issues remain unresolved.”

17) Then consider these remarks by former MHI Chairman, and [still MHI board member](#), 21st CEO [Williams](#) that is [linked here](#).

Within five years of starting 21st Mortgage, there were about sixty companies started with plans to offer manufactured housing financing on a national basis. Of that group of companies we are the only survivor. ...

Warren Buffet is a unique individual with a unique style of managing his companies. He is accessible to Kevin Clayton and very supportive, but he leaves the responsibility for managing the company up to the people who built it. ...

Today, 21st Mortgage is the only lender serving certain segments of the market. ...

I can't emphasize enough the importance of active participation by all members of our industry with state associations and MHI. ...

We need strong associations today more than ever. Part of the reason we have the Dodd-Frank issues is that we were not at the table when the legislation was being drafted. Today we have a wonderful staff at MHI, but they cannot reverse the damage that was done in Dodd-Frank.

18) Later, a high-level source deemed reliable at an MHI meeting that Williams spoke at told *MHProNews* the following. Neither Williams nor any MHI leader has been known to respond publicly or to *MHProNews* about these concerns in recent years, as the Gemini Q&A today above also indicated.

[caption id="attachment_161852" align="aligncenter" width="600"]



"HAPPY THE PILOT PROGRAM FAILED."
- ATTRIBUTED TO
TIM WILLIAMS,
21ST MORTGAGE
CORP PRESIDENT
AND CEO.

Tim Williams [21st CEO] said he was "happy [the GSEs Duty to Serve] pilot program [for manufactured home personal property loans] failed. His words." - Insider Sources.

21st, Clayton Homes, Berkshire Hathaway, the Berkshire dominated Manufactured Housing Institute (MHI), and their attorneys would not confirm or deny that claim after multiple contacts. The statement stands unchallenged.

21st
MORTGAGE CORPORATION

MHI

Their Party Images Are Provided Under Two Year Guarantee.
MHPRONEWS.com
Industry News, Tips and More From Our Site


★ **NATIONAL LENDER OF THE YEAR** ★
2011 | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019

<https://www.manufacturedhomepronews.com/tim-williams-ceo-of-berkshire-owned-21st-mortgage-corp-and-manufactured-housing-institute-board-member-makes-stunning-admission/>[/caption]

19) Put differently, there is an array of evidence that contradictory information exists that seem to point to attempting to cover up apparent antitrust violations that have occurred and apparently continue to occur.

"IF CONGRESS HAD MEANT THE "DUTY TO SERVE" TO BE OPTIONAL, IT WOULD NOT HAVE CALLED IT A "DUTY." THE DICTIONARY DEFINITION OF A "DUTY" HAS - AT ITS CORE - A MANDATORY RESPONSIBILITY."

M. MARK WEISS
PRESIDENT, CEO - MHARR



[caption id="attachment_213599" align="aligncenter" width="600"]

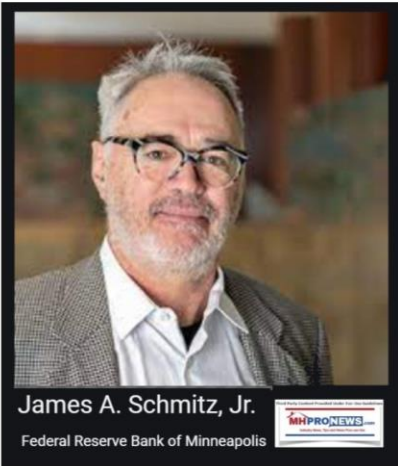


"The consolidation of key industry sectors is an ongoing and growing concern that MHI has not addressed because doing so would implicate their own members. Such consolidation has negative effects on consumers (and the industry) and is a subject that MHProNews and MHLivingNews are quite right to report on and cover thoroughly. This is important work that no one else in the industry has shown the stomach or integrity to address." Mark Weiss, J.D., President and CEO of the Manufactured Housing Association for Regulatory Reform (MHARR) in on the record remarks emailed to MHProNews. For prior comments by Weiss and MHARR on the topic of monopolization click here. See also

See also: <https://www.manufacturedhomepronews.com/consolidation-of-key-mh-industry-sectors-ongoing-growing-concern-mhi-hasnt-addressed-because-doing-so-would-implicate-their-own-members-plus-sunday-weekly-mhville-headlines-recap/>[/caption]

20) Furthermore, Cavco has already been charged by a federal agency, the Securities and Exchange Commission (SEC) with violations of federal law. Some of the evidence the SEC developed may also be keenly relevant to a 'sabotage monopoly' style scheme to hobble the industry and keep it hobbled, all while telling investors a rosy picture of industry potential.

[caption id="attachment_169670" align="center" width="608"]



"Monopolies sabotage and destroy markets.

Monopolies also use their weapons to manipulate and sabotage public institutions for their own gains..."

~ James A. "Jim" Schmitz
Senior Economist and his antitrust research colleagues, cited by economist John Cochrane, Senior Fellow of the Hoover Institution at Stanford.
Note: their term 'monopolies' should be understood to include 'oligopolies.'

John H. Cochrane



The Grumpy Economist

<https://www.manufacturedhomepronews.com/grumpy-economist-cochrane-sun-communities-sui-favorable-demand-drivers-with-supply-constraints-investor-data-yields-quick-case-study-in-buffett-moat/> Several of the illustrations shown in this report can be opened in many browsers to reveal a larger size. To open this picture, click the image once. When the window opens, click it again to reveal the larger size photo. [caption id="attachment_183589" align="center" width="592"]



Federal Reserve Bank of Minneapolis

James A. Schmitz, Jr. | Federal Reserve Bank of Minneapolis



"This [pattern of obscured sabotaging monopoly tactics] leads to whole new set of monopolies, those in [the] manufactured housing industry itself." ~

James A. "Jim" Schmitz Jr., in an presentation to university students. See that full presentation and these

comments in context at the link below.

Schmitz in a separate but related research report on the topic of sabotage monopoly and its impact on manufactured housing said: "This [pattern of obscured sabotage monopoly

tactics] leads to whole new set of monopolies, those in [the] manufactured housing industry itself." <https://www.manufacturedhomepronews.com/affordable-homes-for-low-income-must-produce-in-factory-years-to-unravel-sabotage-grad-students-interest-in-manufactured-housing-factory-home-solutions-plus-sun/>[/caption][caption id="attachment_167485" align="aligncenter" width="600"]



This quote graphic was uploaded to MHPProNews on March 19, 2021. Regular and detail minded MHPProNews readers were 5 YEARS ahead of anyone in MHVille on this topic. That's arguably an example of why our publication dominates in traffic by about 6x over [MHI](#) and [their allied bloggers COMBINED](#), as [Copilot](#) and [Grok](#) confirmed.

<https://www.manufacturedhomepronews.com/sabotaging-monopolies-minneapolis-fed-researchers-charge-hud-collusion-w-builders-to-sabotage-manufactured-housing-independents-created-u-s-housing-crisis/>[/caption][caption id="attachment_173710" align="aligncenter" width="600"]



"PROJECT SATURN," CODE NAME "MONARCH"

**SEC V. CAVCO,
STEGMAYER, ET AL.
FEDERAL SUIT
NEW REVELATIONS
ABOUT CAVCO,
SKYLINE-CHAMPION,
UMH, OTHER
MANUFACTURED HOUSING
BRANDS, APPARENT
MONOPOLIZATION SCHEME
INVOLVING
MANUFACTURED HOUSING
INSTITUTE MEMBERS**



<https://www.manufacturedhomepronews.com/masthead/project-saturn-code-name-monarch-sec-v-cavco-stegmayer-et-al-federal-suit-revelations-about-cavco-skyline-champion-other-manufactured-housing-brands-apparen/>

id="attachment_159512" align="aligncenter" width="548"]



MHI Chairman Joe Stegmayer (Cavco) & Mark Yost, CEO, Skyline Champion

Tweet

This photo from Cavco Industries shows their former Chairman, President and CEO - Joe Stegmayer, sitting side-by-side with Mark Yost, President and CEO of Skyline Champion at the 2019 Inovative Housing Showcase. Stegmayer stepped down from his prior role at Cavco in the wake of an SEC subpoena. Insiders at that firm said that even after foregoing his title, he carried an outside role there relative to his new title. Stegmayer continued to serve as MHI chair even after the scandal that sent Cavco stocks tumbling. Their stock has since recovered.

<https://www.manufacturedhomepronews.com/masthead/project-saturn-code-name-monarch-sec-v-cavco-stegmayer-et-al-federal-suit-revelations-about-cavco-skyline-champion-other-manufactured-housing-brands-apparen/> and

<https://www.manufacturedhomepronews.com/whistleblower-payout-cavco-cvco-settle-with-sec-in-securities-and-exchange-commission-case-vs-cavco-former-ceo-joseph-stegmayer-daniel-urness-21-cv-01507-u-s-district-court-of-az/> and

<https://www.manufacturedhomepronews.com/cavco-industries-sec-issues-notice-to-cvco-plans-enforcement-action-against-cavcos-dan-urness-plus-joe-stegmayer-insider-trade-history-more-insider-insights/> Joe Stegmayer in a video posted at the link below

oddly says something similar to what [Terry Decio](#) did, namely, that in many ways manufactured housing is an untold story. MHI claims to be promoting the industry, if so, then why is it an untold story? <https://www.manufacturedhomepronews.com/joe-stegmayer-cavco-industries-mhi-chairman-insights-from-innovative-housing-showcase/>[/caption]

Longtime Buffett ally, and fellow investor in Berkshire equities, William "Bill" Gates III said the following per CNBC. It is a key to understanding how aspects of this scheme may have developed and emerged.



"I DIDN'T EVEN WANT TO MEET BECAUSE I WARREN THOUGHT 'HEY THIS GUY BUYS AND SELLS THINGS AND SO HE FOUND IMPERFECTIONS IN TERMS OF MARKETS, THAT'S NOT VALUE ADDED TO SOCIETY, THAT'S A ZERO-SUM GAME THAT IS ALMOST PARASITIC.'"

- BILL GATES

statement about Warren Buffett, reported by CNBC on 11.08.2019.

Bill Gates | Facebook

BILL & MELINDA GATES foundation

Microsoft

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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 Gates didn't claim in this quote is that Buffett changed. There is an inference that Gates learned from Buffett and embraced they have each used this parasitic business and advocacy model.

[caption id="attachment_189334" align="aligncenter" width="609"]



"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."

<https://www.manufacturedhomelivingnews.com/reflections-on-death-of-sam-zell-and-late-equity-lifestyle-properties-els-chairman-zells-impact-on-manufactured-home-living-and-the-affordable-manufactured-home-profession/>

[caption id="attachment_173095" align="aligncenter" width="600"]

PROUD MEMBER OF



MONOPOLISTIC HOUSING INSTITUTE



THE NATIONAL ASSOCIATION
SERVING CONSOLIDATORS OF THE
MANUFACTURED HOUSING INDUSTRY



"MHI's relationship with HUD and the GSEs is no secret: most recent issues of MHVillage [s MHInsider] touts some form of progress.¹¹⁵ And yet, only a few loans for this new class of home have been securitized by GSEs.¹¹⁶



Samuel Strommen

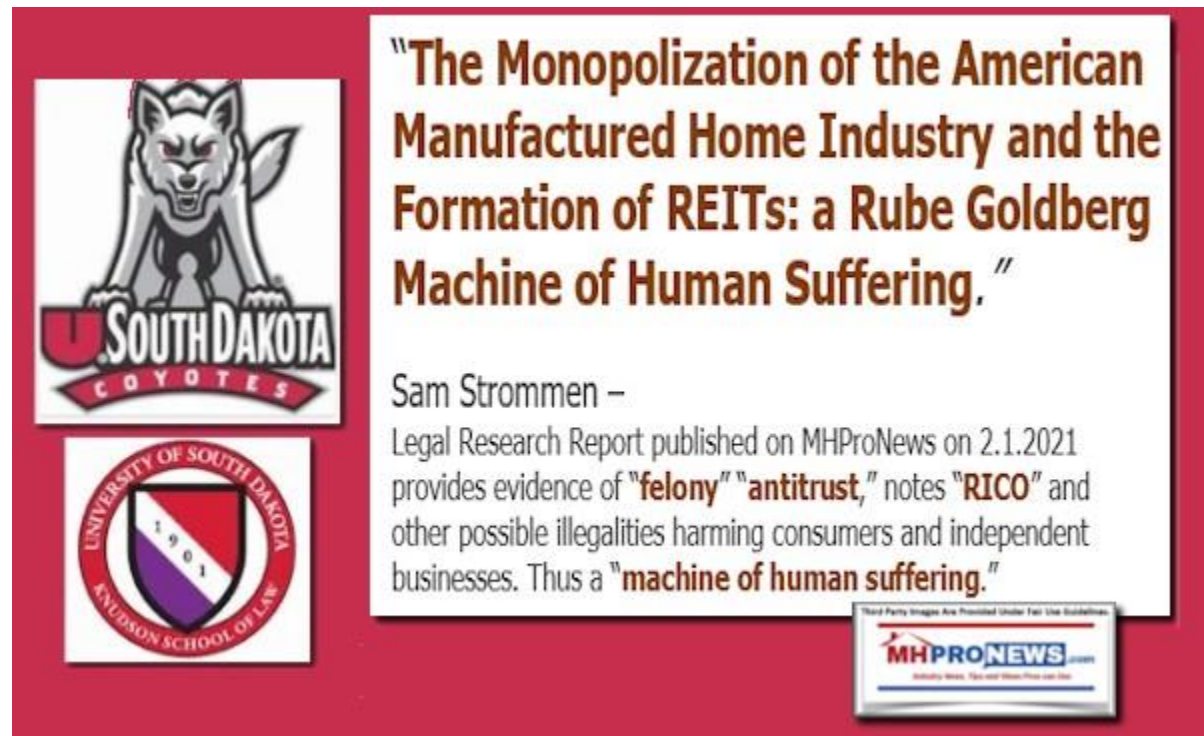
MHIs lobbying of the FHFA, or for that matter HUD, seems to invariably result in policies that either benefit the Big 3 [i.e.: Clayton, Skyline-Champion, Cavco], or at the very least, mitigate detriment. The outcome of these lobbying efforts is stultifying at best, and an abject failure at worst."



– Sam Strommen,
The Monopolization of the American Manufactured Home Industry and the Formation of REITs: a Rube Goldberg Machine of Human Suffering.

Strommen Manufactured Housing Institute remark: MHI is a mouthpiece of the Big 3 - in apparent Restraint of Trade and Should Not Get NOERR protection. Strommen's case could be described as an [oligopoly style](https://www.manufacturedhomepronews.com/masthead/true-tale-of-monopolization) of monopolization. <https://www.manufacturedhomepronews.com/masthead/true-tale-of-monopolization>.

[four-attorneys-research-into-manufactured-housing-what-they-reveal-about-why-manufactured-homes-are-underperforming-during-an-affordable-housing-crisis-facts-and-analysis/](https://www.manufacturedhomelivingnews.com/democratic-congressional-staffer-alleged-manufactured-housing-institute-mhi-anti-consumer-manufactured-housing-institute-leaders-decline-comment-sam-strommen-antitrust-case-allegations-analysis/)[/caption][caption id="attachment_165482" align="aligncenter" width="600"]



"The Monopolization of the American Manufactured Home Industry and the Formation of REITs: a Rube Goldberg Machine of Human Suffering."

Sam Strommen –
Legal Research Report published on MHProNews on 2.1.2021 provides evidence of **"felony"** **"antitrust,"** notes **"RICO"** and other possible illegalities harming consumers and independent businesses. Thus a **"machine of human suffering."**

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<https://www.manufacturedhomelivingnews.com/democratic-congressional-staffer-alleged-manufactured-housing-institute-mhi-anti-consumer-manufactured-housing-institute-leaders-decline-comment-sam-strommen-antitrust-case-allegations-analysis/> and <https://www.manufacturedhomepronews.com/masthead/true-tale-of-four-attorneys-research-into-manufactured-housing-what-they-reveal-about-why-manufactured-homes-are-underperforming-during-an-affordable-housing-crisis-facts-and-analysis/>[/caption]

21) With the above in mind, let's flashback to some recent reporting that shows the costs to consumers caused by these well documented statements, evidence, and trends. Because these are classic 'tells' or signs of monopolization of a market.

a) According to MHI member Berkadia.

[caption id="attachment_218455" align="aligncenter" width="592"]



“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.”



*“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.**” See:*

<https://www.manufacturedhomepronews.com/berkshire-hathaway-brk-linked-berkadia-research-into-land-lease-manufactured-home-communities-market-data-trends-plus-lending-options-increase-for-manufactured-housing-market-mhville-fe/> This sort of

disparity has been described by Gemini as a classic signal of the effects of monopolization of a business sector, in the manufactured housing industry instance, an apparent oligopoly style of monopolization. [/caption]

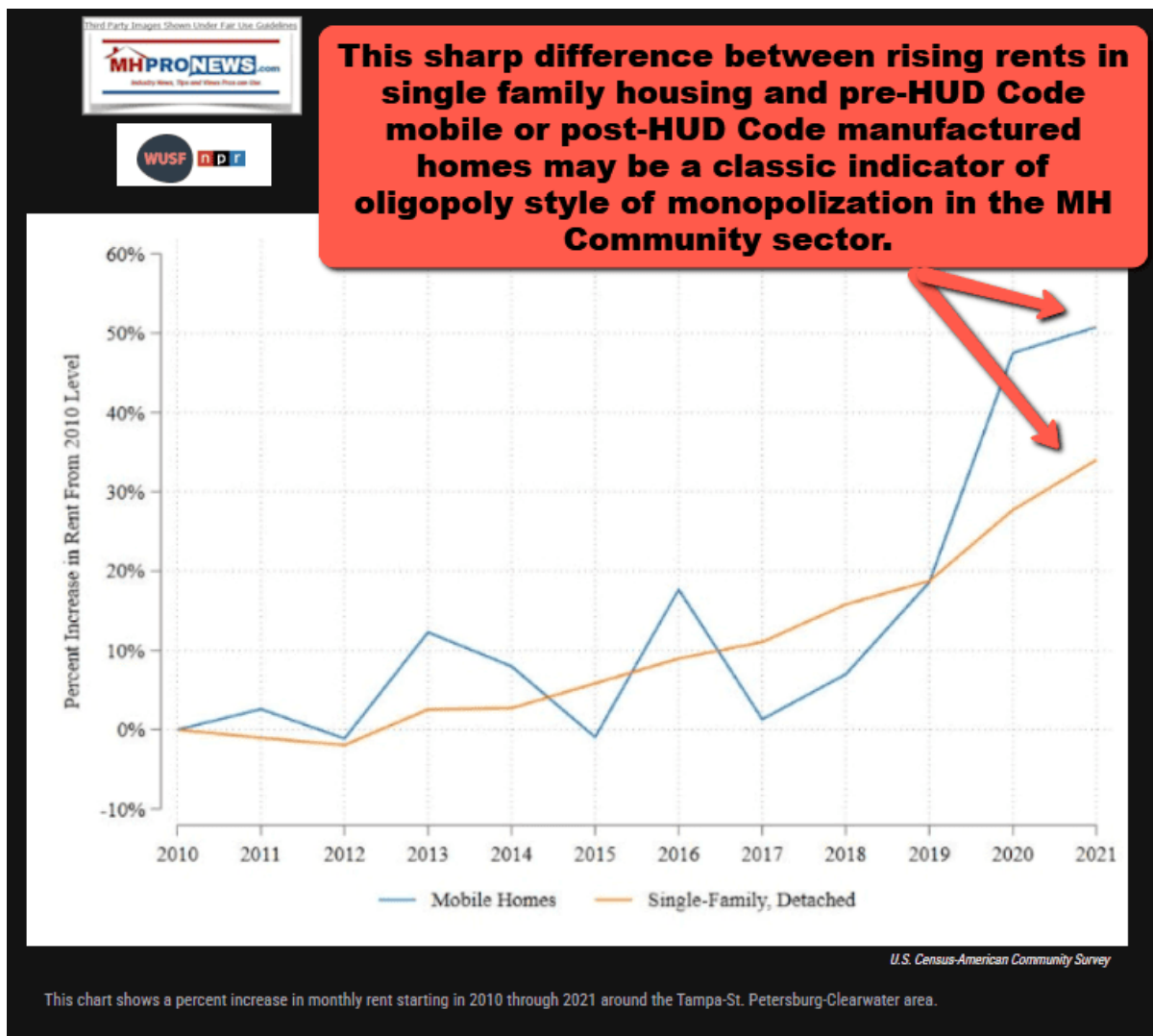
b) From a recent report by WUSF linked below is the following.

[caption id="attachment_218759" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/wusf-even-manufactured-homes-are-becoming-unaffordable-executive-summary-of-woes-impacting-hud-code-manufactured-housing-revealing-apparent-oligopoly-style-monopolization-mhville-f/>[/caption]

c) The sharp difference shown in the chart below between rising rents in single family housing and pre-HUD Code mobile or post-HUD Code manufactured homes may be a classic indicator of oligopoly style of monopolization in the MH Community sector.



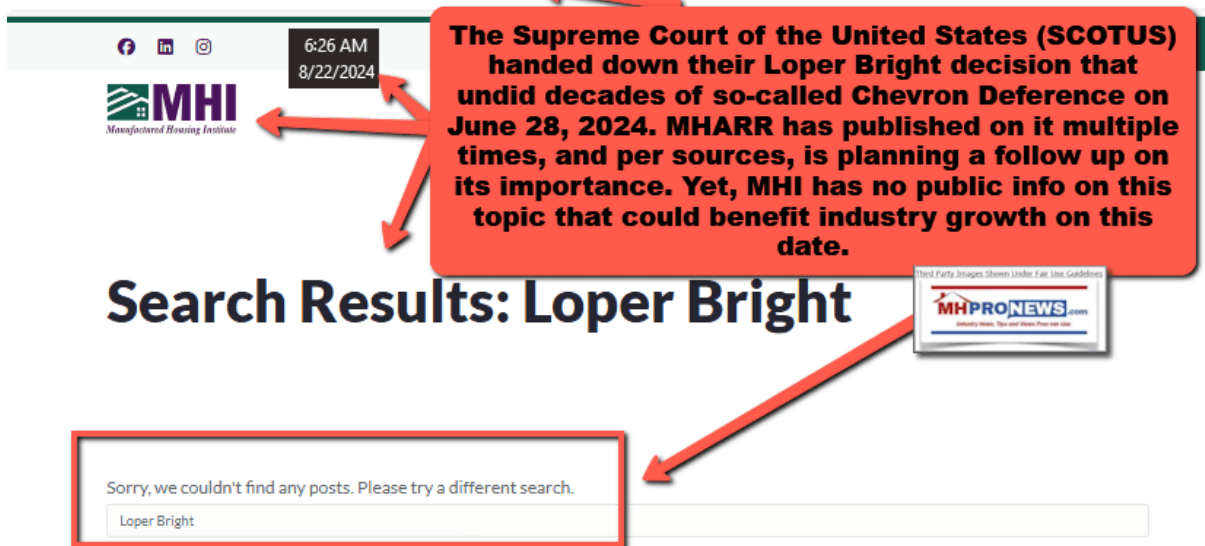
d) Cavco spoke about the southeast dragging. It is not just them, or Florida, that are trailing results in 2025 compared to 2024. Clearly, Cavco understands litigation and its potential, both offensively and defensively. So, why hasn't Cavco, Champion, ELS, Sun, or any of the Berkshire Hathaway brands like 21st Mortgage Corp or Clayton Homes, filed suit to get the Duty to Serve enforced, as MHARR has repeatedly suggested? If Boor says during the conference call that he thinks it is a good idea to have more access to urban placement by HUD Code manufactured homes, then why has he failed to deploy some of his firm's abundant capital into litigation, particularly since the Loper Bright decision may make such litigation easier and more likely to be successful?

[caption id="attachment_203966" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/masthead/loper-brights-light-on-fhfa-fannie-mae-freddie-mac-duty-to-serve-manufactured-housing-and-a-pimple-on-an-elephants-ass-eye-opening-warren-buffett-dts-for-manufactured-homes-wit/> [/caption]

<https://www.manufacturedhousing.org/?s=Loper+Bright>



While MHI hid and public discussion of Loper Bright and what it might mean for possible litigation to advance HUD Code manufactured housing access to more lending at better terms and enforcement of the "enhanced preemption" provision of federal law, the Manufactured Housing Association for Regulatory Reform ([MHARR](#)) has [multiple articles](#)

[that include that Loper Bright related topic](#). One of the important things necessary to understand the sobering realities of the manufactured home industry in the 21st century is to compare what is found (or not found) on the MHI website with what MHARR has published on a similar or the same topic.

e) Those points noted, keep in mind that multiple MHI community operators have been credibly accused of coordinating site fee/rent hikes in land lease communities using ELS owned Datacomp.

[caption id="attachment_218890" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/the-state-and-federal-case-for-criminal-not-just-civil-antitrust-action-in-increasingly-monopolized-manufactured-housing-industry-doj-documents-plus-antitrust-case-evidence-docs-mhville-fea/>

[/caption][caption id="attachment_213215" align="aligncenter" width="547"]

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This is an

apparent miss by ProPublica, given they have covered the RealPage and related on several occasions. [caption id="attachment_214014" align="aligncenter" width="605"]

Monday, May 5, 2025

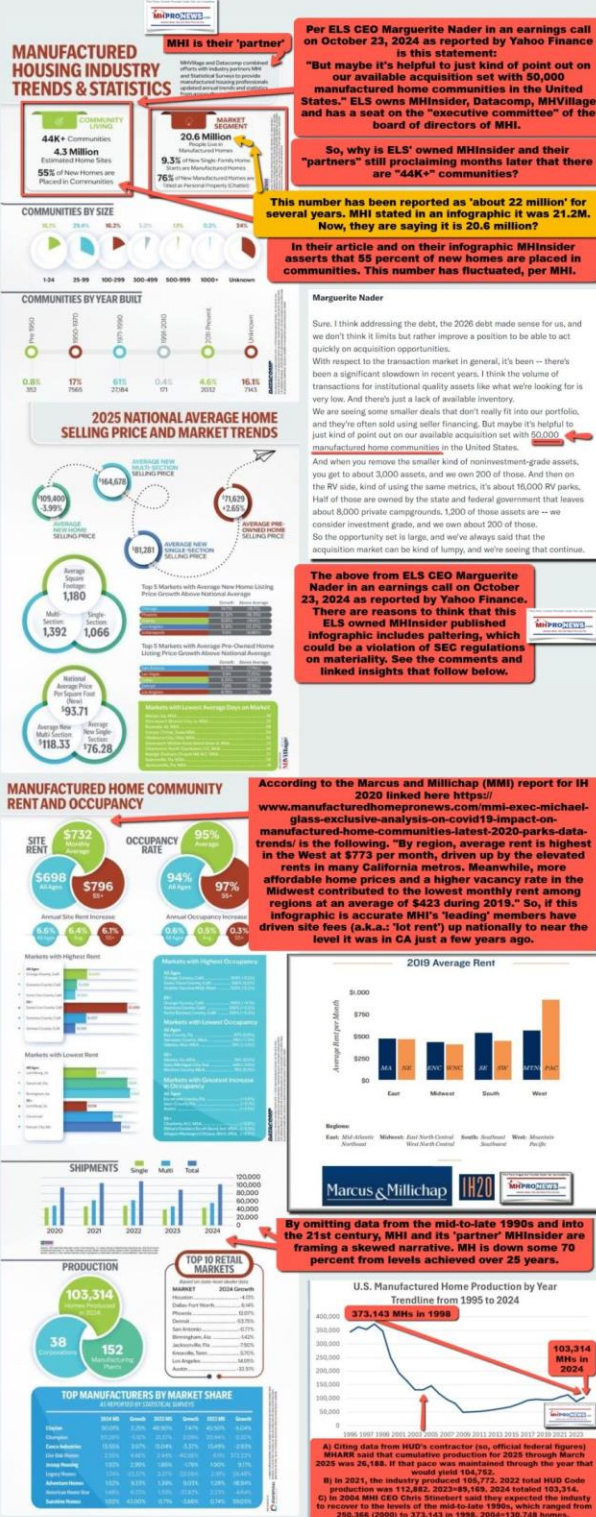


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Manufactured Housing Industry Trends and Statistics Infographic



MHProNews Note depending on your browser

or device, many images in this report and others on MHPProNews can be clicked to expand. Click the image and follow the prompts. For example, in some browsers/devices you click the image and select 'open in a new window.' After clicking that selection you click the image in the open window to expand the image to a larger size. To return to this page, use your back key, escape or follow the prompts. [/caption][caption id="attachment_205474" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/monopoly-justice-dept-sues-realpage-for-pricing-scheme-harming-millions-of-renters-could-doj-come-after-datacomp-and-manufactured-housing-organizations-for-similar-claim-plus/>[/caption]

f) Keep in mind that analyst Greg Palm previously asked Boor why the manufactured home industry was underperforming.

[caption id="attachment_189440" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/analyst-to-cavco-why-is-manufactured-home-industry-production-so-weak-paradox-develops-lower-expectations-more-singles-in-q1-2023-cavco-industrie/>[/caption]

22) With that backdrop, now, let's dip back into specific pull quotes from the earnings call in Part I.

Most of the remarks shown are by Bill Boor, unless otherwise shown.

Per transcript above, the following from CEO William "Bill" Boor.

“Our operating profit was up about 50% compared to both last quarter and a year ago.”

“Another noteworthy result this quarter was the increase in average selling price.”

“The increase in average revenue per home was due to product pricing increases...”

“Our capital deployment will continue to align with our strategic priorities, which include enhancing our plant facilities, pursuing additional acquisitions and consistently assessing opportunities within our lending operation with share buybacks serving as a mechanism to prudently manage our balance sheet after considering these initiatives.”

Florida has been in its own situation for quite a while. And I'd have to say I really don't see any improvement there.

... Southeastern states...It's not doom and gloom, but it was the slowest of our major regions...

“But I'll tell you the biggest factor this time was really that we say same product appreciation.”

Question by Greg Palm: “What are you seeing from the community channel and some of the bigger buyers there?”

“...they've kind of taken their place with more of a historical proportion of overall industry shipments from what we can tell. They've been about 30% or call it, 1/3, and that's if you include builders and developers along with communities.”

Question by Greg Palm: “And then maybe just last one, shifting gears again, just to the regulatory environment. Can you provide maybe any update? I know there was a recent bill that was introduced about chassis removal.”

...the chassis removal from the federal definition was in there. And so I feel really good about that. That's something we've talked in the past. It will take some work and some time. But if we can get that out of the definition, I think it's going to open up a lot of innovation for our industry, and that will kind of allow us to do things like penetrate more into urban settings as an example. So that's a big plus. There was some stuff in there about kind of trying to continue to encourage local municipalities and states to work on zoning.

...If I had a disappointment when I read it and talked to folks about it, it's that Congress is trying to provide some support and funding for community preservation and community development in general, but they tend to be a little bit discriminatory in the ownership of those communities. And so they're very focused on this idea of resident-owned communities. In the right situation, that can be a good solution. Sometimes they aren't everything that the name kind of implies and sometimes they're really not working out well. And so the fact that Congress continued in this bill to kind of leave the very successful for-profit community ownership model out was a little bit concerning.

...It reflects a lot of the lobbying we've done in D.C. to try to get manufactured housing more part of the conversation.

In response to question by Jay McCanless on chattel mortgage rates.

So it's still in that 8% to 9% range.

...there's a lot of people that are out there that need homes and they're generating the traffic numbers...

... there was a little more confidence or it shows that, that pent-up demand for housing is powering through that concern.

In response to this inquiry by **Jesse T. Lederman**: **“So for example, if maybe this quarter, you had more higher household income at retail or through CountryPlace, that would suggest maybe some people mix shifting from an existing home or buying a new home to a manufactured home. Is that something you guys have insight into?”**

Boor: **“It's not something that we've tracked very closely at a macro level. So it's an interesting thought and something we'll think about. But I don't have any statistics for you right now on that.”**

“I mean our model is to originate and sell, right?” “...We retain the servicing rates, and so we get an annuity stream in that sense. That's our base model.” “...the traditional investors have really kind of dramatically reduce the amount of loans they're buying.”

“...I think that, that relative share of new housing units, if you want to think about it that way, should really go in favor of manufactured housing...”

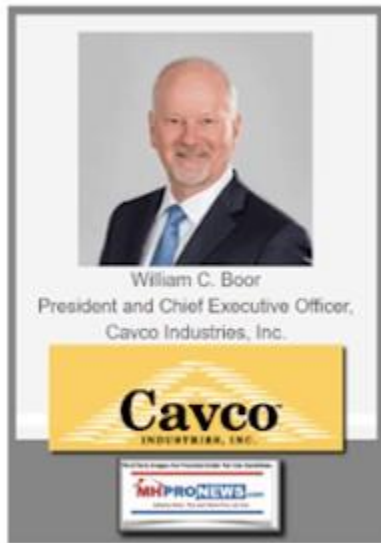
In response to an inquiry by **Jay McCanless**:

“I was just looking at last quarter's transcript, and I think the one thing we haven't talked about is the price competition that you all were seeing last quarter.”

“I would generally say no.” “...There is more of an upward bias that I'm hearing in the local markets than downward.”

That array of quotes should be held up against prior remarks made by Boor, like the one below when he said that the industry was poised to surpass conventional housing.

[caption id="attachment_163121" align="aligncenter" width="600"]



"But we've got a great opportunity here, I think as an [manufactured home] industry to catch-up with building."

- William C. Boor,
President and Chief Executive Officer,
Cavco Industries (CVCO).
during Q2 2021 earnings call.

Bill Boor is correct in saying that the industry has an opportunity to 'catch up' - or even pass - conventional housing builders. But that opportunity existed 2 decades ago too. That means, that until the root issues are addressed, authentic progress will not be obtained. That noted, by addressing the root issues robust growth can occur. This article was posted on December 7, 2020. <https://www.manufacturedhomepronews.com/seeking-alpha-cavco-industries-nasdaqcvco-data-sheds-light-on-recent-manufactured-housing-institute-controversies-plus-manufactured-home-investing-stock-updates/>[/caption]

It is stunning that Boor, who previously argued for the enforcement of the [2000 Reform Law](#) in testimony to Congress, acts as if he doesn't know what that is. Why push for a flawed ROAD to Housing Act 2025 when all Boor has to do is get HUD and the FHFA to enforce existing federal laws? Clearly, Boor seems to be failing in his fiduciary duties. The same concern could be raised about Cavco's board, and that of other boards that are engaged in this apparently oligopoly style of monopolization.

[caption id="attachment_192179" align="aligncenter" width="602"]



“HUD must strengthen preemption enforcement...and provide...transparent guidelines for compliance. Further, HUD must respond promptly and definitively whenever localities violate” enhanced preemption.

— William “Bill” Boor,
CEO Cavco Industries
MHI Vice Chairman
Remarks to Congress 7.14.2023

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MHLivingNews
Improved Living for Less

DOUBLE-DIGIT
2023 MANUFACTURED
HOME PRODUCTION
SLIDE CONTINUES,

**PER NATIONAL MANUFACTURED
HOUSING ASSOCIATION-MORE
NEW MANUFACTURED HOME
LIVING FACTS**

<https://www.manufacturedhomelivingnews.com/double-digit-2023-manufactured-home-production-slide-continues-per-national-manufactured-housing-association-more-new-manufactured-home-living-facts/> and
<https://www.manufacturedhomepronews.com/cavco-ceo-william-bill-boor-for-mhi-to-congress-esg-distorts-market-v-roxanne-bland-martin-lavin-follow-the-money-pay-more-attenti/>

[caption id="attachment_216346" align="aligncenter" width="599"]

ENFORCE THE LAWS



**MHIA
(2000)**



**DTS
(2008)**



ANTITRUST

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

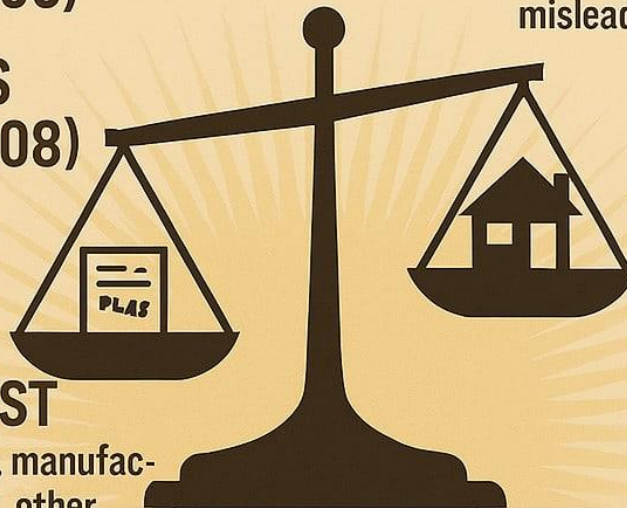
SECURITIES

SEC rules to prevent misleading investors



RICO

Criminal penalties for fraud and collusion



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.



HOBBS ACT

Criminal penalties for extortion or threats



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<https://www.manufacturedhomepronews.com/what-is-a-fiduciary-do-nonprofit-board-members-have-a-fiduciary-duty-what-is-self-dealing-what-does-fbi-do-and-what-role-does-the-fbi-play-in-white-collar-loss-of-right-crimes-mhville-fea/> [/caption]

23) That being so, it would appear that what would seem to be multiple material contradictions in messaging to be an oligopoly style of market monopolization.

While MHProNews has apparently done more reporting on these subjects than anyone else, that is not to imply that others in mainstream media have also shed light on some of these issues.

From a report [linked here](#).

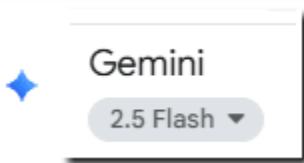
- *The Nation* – Feb 15, 2018 – [Special Investigation: The Dirty Secret Behind Warren Buffett's Billions Berkshire Hathaway subsidiaries Clayton Homes....](#),
- *Forbes* – [Warren Buffett's Exploitative Mobile Home Investment](#) (note the terminology is in error, but the points are to be taken seriously),
- *Seattle Times* – [Federal officials investigating practices of Warren Buffett's lending practices at Clayton Homes....](#),
- *The Atlantic*, analysis of IBISWorld on 'the fastest dying industry-mobile homes,'
- *Jacksonville Florida Times Union* – [John Oliver's recent video slamming predatory businesses...involving Clayton Homes...MHI members....](#),

- *GuruFocus* – [Warren Buffett Can't Escape Unethical Strategic 'Moats'...Clayton Homes...](#),
- antitrust-focused [Open Markets](#),
- plus the 'smoking gun' evidence of purported [prima facie antitrust against Buffett, Kevin Clayton, Clayton Homes, 21st and related RICO concerns linked here](#),

Among those mainstream, financial media, and nonprofit statements, is the one based in part upon [IBISWorld](#) report that called 'mobile homes' the 'fastest dying business in America.' What response did MHI give to that claim? MHIProNews asked left-leaning Google's AI powered Gemini.

What public pushback, if any, can find on the Manufactured Housing Institute (a.k.a.: MHI or [manufacturedhousing.org](#)) website, via comments to media, or through a press release to the IBIS World and Atlantic report linked here:

<https://www.theatlantic.com/business/archive/2011/04/americas-fastest-dying-business-its-mobile-homes/73336/>

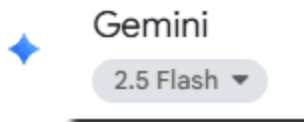


Based on my searches of the MHI website and a broader web search, I could not find any public pushback or direct rebuttal from the Manufactured Housing Institute (MHI) specifically addressing *The Atlantic's* 2011 article, "America's Fastest-Dying Business Is... Mobile Homes."

The MHI website and press releases do not appear to contain any direct response to the IBISWorld report or *The Atlantic's* article. While MHI has published content that aims to promote a positive view of the industry and its growth potential, there is no evidence of a direct public statement, press release, or comment to media that serves as a rebuttal to the specific claims made in that article.

It is possible that MHI's strategy was to ignore the article rather than provide a direct public response, or that any such response was not widely publicized and is not easily discoverable through a search of public-facing content.

--- MHIProNews notes that the screen capture that documents the accuracy of the exchange above is shown below. ---



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24) Stop and think. [Buffett in his 2009 letter to Berkshire Hathaway \(BRK\) investors](#), after clearly disclosing that they have a dog in the hunt, made several statements that in hindsight may have been designed to keep people from entering the manufactured housing industry. This is abbreviated from the previously shown remarks to help focus on statements that may be used to keep possible competitors out.

Finance and Financial Products

Our largest operation in this sector is Clayton Homes, the country's leading producer of modular and manufactured homes. Clayton was not always number one: A decade ago the three leading manufacturers were Fleetwood, Champion and Oakwood, which together accounted for 44% of the output of the industry. All have since gone bankrupt. Total industry output, meanwhile, has fallen from 382,000 units in 1999 to 60,000 units in 2009.

...

The industry is in shambles for two reasons, the first of which must be lived with if the U.S. economy is to recover. ...

The second reason that manufactured housing is troubled is specific to the industry: the punitive differential in mortgage rates between factory-built homes and site-built homes. ...

The residential mortgage market is shaped by government rules that are expressed by FHA, Freddie Mac and Fannie Mae. ...

In contrast, very few factory-built homes qualify for agency-insured mortgages. ... If the buyer needs mortgage financing, however – and, of course, most buyers do – the difference in financing costs too often negates the attractive price of a factory-built home.

We have tried to qualify more of our customers' loans for treatment similar to those available on the site-built product. So far we have had only token success. ... If qualifications aren't broadened, so as to open low-cost financing to all who meet down-payment and income standards, the manufactured-home industry seems destined to struggle and dwindle.

Even under these conditions, I believe Clayton will operate profitably in coming years, though well below its potential. We couldn't have a better manager than CEO Kevin Clayton, who treats Berkshire's interests as if they were his own. Our product is first-class, inexpensive and constantly being improved. Moreover, we will continue to use Berkshire's credit to support Clayton's mortgage program, convinced as we are of its soundness. Even so, Berkshire can't borrow at a rate approaching that available to government agencies. This handicap will limit sales, hurting both Clayton and a multitude of worthy families who long for a low-cost home.

25) Put differently, the Buffett remarks themselves may have been deployed a tool for the Clayton-21st-VMF-Berkshire moat. With that in mind, is it possible that the failure of MHI to respond to the *Atlantic* or other negative media was more likely yet another tool to keep new players from entering manufactured housing?

Recall Tim Williams' prior remark to *MHPProNews* and those of apparently fellow and notorious MHI member Frank Rolfe (MHP Funds, Impact Communities, Mobile Home University, Mobile Home Park Store, etc.).

[caption id="attachment_172654" align="aligncenter" width="500"]



"There are good arguments that we should respond to every story, refute every statistic, and make our case to the public."

– Tim Williams, President, and CEO
of Chairman Warren Buffett's
Berkshire Hathaway owned 21st Mortgage Corp.



There are good arguments to be made that we [i.e.: MHI, the industry, etc.] should respond to every story, refute every statistic, and make our case to the public. With all due respect to Tim Williams and MHI leaders, can you spell disconnect? [Paltering](#)? Or [hypocrisy](#)? Why hasn't MHI done what Williams indicated would be done when a PR professional was hired for MHI years ago? Hindsight with MHI is highly revealing. Especially when their words are contrasted with their deeds. For the context of Williams' remarks, see his remarks to MHPProNews linked here:

<https://www.manufacturedhomepronews.com/industryvoices/about-responding-to-pbs-newshours-bad-bargain-report-by-stephen-fee/>

[caption id="attachment_175825" align="aligncenter" width="610"]



"Negative articles on the industry are met with "no comment" [by MHI]. Positive news opportunities are met with "no comment." I've never seen anything like it."

"Probably the greatest enemy to the growth of the mobile home park industry into a mainstream form of real estate investment is ... our industry itself."

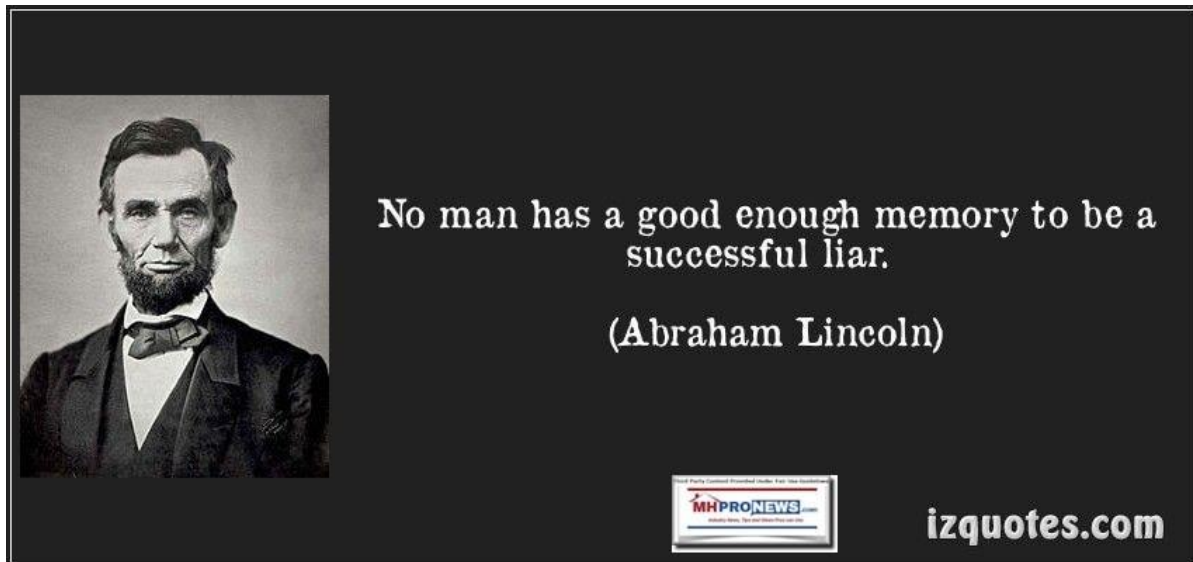
Frank Rolfe, RV Horizons and MHU. To see that report, click this image.

The [principle of separating wheat from the chaff](#) must be used with Frank Rolfe and all others. In quoting Rolfe, we are not endorsing his business practices but are rather pointing out an apt statement that criticizes the association he himself is a member of today.

[/caption]

26) The fact that several of these various players that are MHI members may at times contradict themselves and/or each other, may not be such a surprise. The following quote has been attributed to Abraham Lincoln, which could make it over 160 years old.

[caption id="attachment_171266" align="aligncenter" width="597"]



By

carefully tracking the various statements and claims, past or present, by various MHI linked operations, MHProNews is able to demonstrate the apparent disconnects between their prior claims and their later deeds. It is often comparing past claims by the same source with more recent ones that disconnects appear and prior claims are revealed to be inaccurate. Knowing those past and more recent claims, who is and is not reliable, is a potentially important advantage in exploring legal, regulatory and other issues in MHVille. [/caption]

27) Cavco's stock track year to date is noteworthy. Even with stock buybacks, another announced acquisition, and their so-called strong unified brand strategy, their stock has been a bit of a roller coaster.

[caption id="attachment_219064" align="aligncenter" width="609"]



Note: depending on your browser or device, many images in this report can be clicked to expand. For example, in some browsers/devices you click the image and select 'open in a new window.' After clicking that selection, you click the image in the open window to expand the image to a larger size. To return to this page, use your back key, escape or follow the prompts. [/caption]

28) In 2020, [MHLivingNews](#) said this.

- **Brian Montgomery**, J.D., current Assistant Secretary of Housing and Urban Development for Housing, also known as the commissioner of the Federal Housing Administration. He was nominated in September to become the HUD deputy secretary, the second most senior official at HUD. For reasons that will become plain, as a segue and disclosure, Montgomery's nomination is one that we editorially oppose.
- **Teresa Payne**, J.D. currently the administrator for the Office of Manufactured Housing Programs (OMHP). For reasons that will become increasingly obvious, as a segue and disclosure, we believe that Montgomery and Payne should both be asked to resign or terminated for dereliction in the respective duties of their office.

29) Since the Teresa Payne, J.D., has joined MHI a few months ago. Restated, MHI hired a woman who failed to implement the "[enhanced preemption](#)" provision of manufactured housing, which MHI admits hurts the industry. Cavco's CEO [Bill Boor is MHI's chairman](#). What is going on?

[caption id="attachment_214092" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/masthead/manufactured-housing-institute-email-ceo-lesli-gooch-via-linkedin-teresa-payne-joined-mhi-tip-paynes-policies-favored-largest-manufacturers-for-years-now-she-joined-mhi-co/> [/caption]

The apparent answer is what [Mark Weiss, J.D., previously called a "shell game" that is "on steroids."](#)



*Gus Rodriguez, Tejas Homes,
Conroe, TX*

"Dear Tony and Soheyla,

**Thank you for your great reporting on our industry
and the challenges we face as independent retailers.**

**There is no greater resource that speaks to the
issues and opportunities than your publications.**

**We are glad you spotlight the key issues we need to
address to succeed.**

**"Too bad not enough fellow retailers are planning
accordingly." Thank you both." – Gus Rodriguez.**

Editor's note: Gus' kind message for publication were among the calls and messages that have been received in response to the latest emailed news updates, found at the link below.

<http://www.MHProNews.com/newsletter/2018/01/15/kevin-clayton-interview-marcus-millichap-tax-reform-housing-impact-mlk-immediate-expensing-mh-9-tips-mh-websites-presidential-insanity-1-15-2018/>

30) Let's pivot back to the question posed to Gemini above Cavco et al, but this time posed to Grok.

Grok, is there any known pushback to the purported tying letter by 21st Mortgage Corporation's Tim Williams by consolidators in manufactured housing that are routinely MHI members, or by MHI itself? <https://www.manufacturedhomeprnews.com/wp-content/uploads/2022/03/21stMortgageLetterheadTimWilliamsLetterApparentAntitrustViolation.png> and <https://www.manufacturedhomeprnews.com/masthead/true-tale-of-four-attorneys-research-into-manufactured-housing-what-they-reveal-about-why-manufactured-homes-are-underperforming-during-an-affordable-housing-crisis-facts-and-analysis> Can you find any pushback or antitrust concerns raised anywhere online by Cavco (CVC), Champion (SKY), Equity LifeStyle Properties (ELS), Sun Communities (SUI) or others who have been steadily consolidating the manufactured housing industry during this 21st century period of low production, which have been described by some critics as part of a scheme for an oligopoly style monopolization of the industry? As you search for any such pushback, if Cavco or Champion (for examples) were complaining against such claimed antitrust violation and demanding an investigation, wouldn't that call into question the series of events that made their ability to consolidate sizable parts of the industry into sharper focus? Doesn't something similar apply to community operators, noting that Sam Zell himself said he liked the oligopoly nature in the business and that Frank Rolfe (all of those are linked to firms that are MHI members) said no new communities should be developed? And hasn't their been data developed recently that suggests that costs are higher in both the communities and production side of the industry, faster than the pace of inflation, that may be a classic side of oligopoly style monopolization? Unpack that and link results using plain text hyperlink to support your findings. BTW, I've asked a similar question from Gemini.



Thought for 53s

No direct evidence of pushback to the 21st Mortgage Corporation's Tim Williams tying letter (dated March 2009, linked in the query as an apparent antitrust violation under Sherman/Clayton Acts for restricting lending to non-Clayton dealers) was found from consolidators like Cavco Industries (CVCO), Skyline Champion (SKY), Equity LifeStyle Properties (ELS), Sun Communities (SUI), or the Manufactured Housing Institute (MHI). Searches across web, X, and company sites yielded no statements, filings, or comments from these entities criticizing the letter or demanding investigations—despite their MHI membership and industry prominence. Instead, results highlight ongoing antitrust scrutiny (e.g., class-actions against ELS/SUI for rent-fixing) and critiques from independent sources

like MHPProNews, MHARR, and attorneys (e.g., Samuel Strommen), accusing these firms of benefiting from the low-production environment enabled by such practices. MHI's site shows no response to the letter, aligning with patterns of inaction on enforcement (e.g., no advocacy for DTS chattel lending, which the letter exacerbated). Company IR pages (e.g., Cavco, Skyline Champion) focus on growth via acquisitions without antitrust mentions.

Absence of Pushback and Implications for Consolidation

The lack of pushback is notable given these firms' consolidation during 21st-century low production (~89,000 annual shipments vs. 373,000 in 1998), described by critics as oligopoly monopolization via "moats" (Buffett term) like lending restrictions and zoning barriers. If Cavco or Skyline Champion had complained (e.g., demanding DOJ/FTC probes), it would spotlight how the letter (post-2003 Berkshire/Clayton entry) facilitated their rise: Cavco grew via acquisitions like Fleetwood (2019), controlling ~20% market share; Skyline Champion merged in 2018, dominating ~40% with Clayton. This "Big 3" (Clayton, Cavco, Skyline) now holds ~80% production, per Strommen/Minneapolis Fed research on "sabotage monopoly." Silence implies complicity or benefit, as low output boosts margins (e.g., Cavco's IR pitches "supply constraints"). See Cavco's August 2025 IR deck (uploaded document, page 1-2) bragging on "compelling supply/demand fundamentals" amid consolidation.

Similar logic applies to community operators: No pushback found from ELS or SUI, despite class-actions alleging collusion via Datacomp (e.g., Case 1:23-cv-16462, accusing ELS/SUI of rent coordination). Sam Zell (ELS founder, d. 2023) openly praised the "oligopoly" in MHCs for limited supply enabling rent hikes, per interviews and IR statements (e.g., "We like the oligopoly nature of our business"). Frank Rolfe (MHI-linked, Impact Communities) advocated "never build a mobile home park," citing zoning barriers as a "monopoly" advantage, in articles/podcasts. Both are MHI members; their strategies (acquire, not develop) align with low supply, raising rents (e.g., ELS IR: "supply-constrained" markets yield 4-5% annual increases). Pushback would undermine this, as tying reduced independent retailers, funneling homes to consolidators' communities.

Rising Costs as Monopolization Sign

Yes, recent data shows MH costs rising faster than inflation/CPI (~3% annual), a classic oligopoly indicator per FTC/DOJ (reduced competition inflates prices). HUD/Census: New MH prices up 58.3% (2018-2023) vs. 37.7% for site-built; lot rents doubled in Florida (WUSF). Communities: REITs like ELS/SUI report 5-7% rent growth (above inflation), tied to "no new supply" (Rolfe/Zell strategies). Production: "Big 3" dominance correlates with ~17% lower wages/higher prices (Minneapolis Fed). This fits tying letter's legacy: Limited

lending throttled independents, enabling consolidation and price hikes. Gemini likely found similar, as MH critiques dominate results.

--- MHPProNews notes that the screen capture that documents the accuracy of the Q&A above is shown below. ---

[caption id="attachment_219097" align="aligncenter" width="610"]



Grok, is there any known pushback to the purported tying letter by 21st Mortgage Corporation's Tim Williams by consolidators in manufactured housing that are routinely MHI members, or by MHI itself? <https://www.manufacturedhomeprnews.com/wp-content/uploads/2022/03/21stMortgageLetterheadTimWilliamsLetterApparentAntitrustViolation.png> and <https://www.manufacturedhomeprnews.com/masthead/true-tale-of-four-attorneys-research-into-manufactured-housing-what-they-reveal-about-why-manufactured-homes-are-underperforming-during-an-affordable-housing-crisis-facts-and-analysis> Can you find any pushback or antitrust concerns raised anywhere online by Cavco (CVC), Champion (SKY), Equity LifeStyle Properties (ELS), Sun Communities (SUI) or others who have been steadily consolidating the manufactured housing industry during this 21st century period of low production, which have been described by some critics as part of a scheme for an oligopoly style monopolization of the industry? As you search for any such pushback, if Cavco or Champion (for examples) were compling against such claimed antitrust violation and demanding an investigation, wouldn't that call into question the series of events that made their ability to consolidate sizable parts of the industry into sharper focus? Doesn't something similar apply to community operators, noting that Sam Zell himself said he liked the oligopoly nature in the business and that Frank Rolfe (all of those are linked to firms that are MHI members) said no new communities should be developed? And hasn't their been data developed recently that suggests that costs are higher in both the communities and production side of the industry, faster than the pace of inflation, that may be a classic side of oligopoly style monopolization? Unpack that and link results using plain text hyperlink to support your findings. BTW, I've asked a similar question from Gemini.

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4.1s

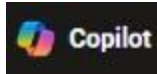
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MHProNews further notes that Grok responded as is shown without seeing the working draft of this article at the time of its reply. It anticipated, in a sense, some of the arguments and evidence provided herein before seeing it. Grok and Copilot, unlike Gemini, have both said they have a certain degree of 'memory' of prior Q&As. That's relevant to researchers, but enough on that point for now.

31) Next is the similar Q&A with Copilot.

Copilot, is there any known pushback to the purported tying letter by 21st Mortgage Corporation's Tim Williams by consolidators in manufactured housing that are routinely MHI members, or by MHI itself? <https://www.manufacturedhomepronews.com/wp-content/uploads/2022/03/21stMortgageLetterheadTimWilliamsLetterApparentAntitrustViolation.png> and <https://www.manufacturedhomepronews.com/masthead/true-tale-of-four-attorneys-research-into-manufactured-housing-what-they-reveal-about-why-manufactured-homes-are-underperforming-during-an-affordable-housing-crisis-facts-and-analysis> Can you find any pushback or antitrust concerns raised anywhere online by Cavco (CVC), Champion (SKY), Equity LifeStyle Properties (ELS), Sun Communities (SUI) or others who have been steadily consolidating the manufactured housing industry during this 21st century period of low production, which have been described by some critics as part of a scheme for an oligopoly style monopolization of the industry? As you search for any such pushback, if Cavco or Champion (for examples) were complaining against such claimed antitrust violation and demanding an investigation, wouldn't that call into question the series of events that made their ability to consolidate sizable parts of the industry into sharper focus? Doesn't something similar apply to community operators, noting that Sam Zell himself said he liked the oligopoly nature in the business and that Frank Rolfe (all of those are linked to firms that are MHI members) said no new communities should be developed? And hasn't their been data developed recently that suggests that costs are higher in both the communities and production side of the industry, faster than the pace of inflation, that may be a classic side of oligopoly style monopolization? Unpack that and link results using plain text hyperlink to support your findings. BTW, I've asked a similar question from Gemini and Grok.



Thanks, Tony. Here's a full unpacking of your inquiry using our FEA methodology, triangulating across the Tim Williams/21st Mortgage letter, Strommen's antitrust thesis, recent lawsuits, and online sources.

1. Pushback to the 21st Mortgage Letter: Any Evidence?

No known pushback found from:

- **Cavco Industries (CVCO)**
- **Skyline Champion (SKY)**
- **Equity LifeStyle Properties (ELS)**
- **Sun Communities (SUI)**
- Or other MHI-linked consolidators

Despite the [purported tying letter from Tim Williams of 21st Mortgage](#)—which Strommen and others have described as a potential antitrust violation—there is no public record of these firms objecting, demanding investigations, or distancing themselves from the practice.

 Strommen's thesis: [“The Monopolization of Manufactured Housing”](#)

2. Antitrust Lawsuits: Community Operators Named

Confirmed.

A federal class action lawsuit filed in Illinois names:

- **ELS, Sun, RHP, YES! Communities**, and others
- Alleging **price fixing and collusion** via Datacomp's JLT reports

 [Class Action Complaint – Gregg Townsend v. ELS et al.](#)

 [Lowey Dannenberg Investigation](#)

3. Sam Zell and Frank Rolfe: Oligopoly Advocacy?

Confirmed.

- Zell praised the “oligopoly nature” of the business in earnings calls.
- Rolfe said **no new communities should be built**, reinforcing supply constraints.

 [Zell’s strategic moves](#)

 [Rolfe’s silence on consent judgment](#)

4. Cost Increases: Faster Than Inflation?

Confirmed.

- Lot rents rose from \$382 to \$593 between 2010 and 2021—a **55% increase**.
- Manufactured home prices also rose faster than inflation.
- Experts and AI systems attribute this to **oligopoly-style monopolization**.

 [WUSF Report + MHProNews Analysis](#)

 [BIS Working Paper on Lending Concentration](#)

Summary Table: Pushback & Antitrust Signals

Entity/Firm	Pushback to 21st Letter	Antitrust Lawsuit Named	Public Defense or Rebuttal
Cavco	✗ None found	✗ Not named	✗ None found
Champion	✗ None found	✗ Not named	✗ None found
ELS	✗ None found	✓ Named in suit	✗ None found
Sun	✗ None found	✓ Named in suit	✗ None found
MHI	✗ None found	✗ Not named	✗ No rebuttal to MHARR or Strommen

Key Supporting Links

- [Tim Williams Letter – 21st Mortgage](#)

- [Strommen's Antitrust Thesis](#)
- [Class Action Complaint – Gregg Townsend v. ELS et al.](#)
- [Lowey Dannenberg Antitrust Investigation](#)
- [Sam Zell's Industry Strategy](#)
- [WUSF + MHProNews Cost Analysis](#)
- [BIS Working Paper on Lending Concentration](#)

Would you like this synthesized into a stakeholder briefing or visual timeline of consolidation and antitrust signals? I can also help draft a memo for lawmakers or regulators based on these findings.

1. <https://www.manufacturedhomepronews.com/wp-content/uploads/2022/03/21stMortgageLetterheadTimWilliamsLetterApparentAntitrustViolation.png>
2. <https://www.manufacturedhomepronews.com/masthead/true-tale-of-four-attorneys-research-into-manufactured-housing-what-they-reveal-about-why-manufactured-homes-are-underperforming-during-an-affordable-housing-crisis-facts-and-analysis>
3. <https://www.courthousenews.com/wp-content/uploads/2023/12/mobile-homes-antitrust-class-action.pdf>
4. <https://www.globenewswire.com/news-release/2023/09/25/2748963/0/en/Lowey-Dannenberg-Investigates-Antitrust-Claims-on-Behalf-of-Owners-of-Manufactured-Homes.html>
5. <https://www.mobilehomeuniversity.com/articles/sam-zell-is-now-betting-on-the-macro-mobile-home-park-industry-going-mainstream>
6. <https://www.manufacturedhomepronews.com/rv-horizons-and-impact-communities-agree-to-consent-judgment-frank-rolfe-dave-reynolds-and-mhi-leaders-asked-to-react-mhphoa-residents-alert-and-memorial-day-2023-manufactured-ho/>
7. <https://www.manufacturedhomepronews.com/wusf-even-manufactured-homes-are-becoming-unaffordable-executive-summary-of-woes-impacting-hud-code->

manufactured-housing-revealing-apparent-oligopoly-style-monopolization-mhville-f/

8. <https://www.bis.org/publ/work1255.htm>

--- MHPProNews notes that the screen capture that documents the accuracy of the Q&A above is as shown below. ---

MHPProNews also notes that Copilot identified a useful document (#8 above), the title of that is shown below. This [MHVille FEA](#) style of AI confirmation and [triangulation](#) does have benefits and bonuses. Readers get 'rigorously' fact checked information. Yours truly for MHPProNews periodically gets some new piece of evidence that routinely tends to further strength the thesis being presented.

--- Per the BIS.org #8, above ---

Affordable housing, unaffordable credit? Concentration and high-cost lending for manufactured homes

If Boor and Cavco were serious about getting more homes sold, instead of talking about carrying some loans on their own books, as Legacy and Clayton-linked 21st and VMF do, they should be focused instead on getting more market-rate credit. MHPProNews plans on unpacking that research paper in the near term. Stay tuned.

Put differently, Cavco and others involved at MHI periodically dangle the notion manufactured housing could be a larger share of the market. It could. That is historic fact and has been demonstrated numerous times using ADU and other parallels.

[caption id="attachment_218999" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/fresh-mhi-ceo-dr-lesli-gooch-award-reveal-by-most-prolific-most-rigorous-research-writer-in-modern-manufactured-housing-industry-history-fea-plu/>[/caption]

As some have observed, there is a maxim among con artists. "Never give up the con."

[caption id="attachment_216105" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/never-give-up-the-con-rigged-system-special-interests-defining-understand-u-s-affordable-housing-crisis-and-manufactured-housing-industry-underpe/>[/caption]

That said, as whistleblower rewards are now being dangled in front of the industry's members for still more antitrust evidence, it may not be a shock if one or more step forward.

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



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

32) Boor's defense of MHCs, while arguably unjustly dismissing the value and stunningly high success rate and resident satisfaction found in resident owned communities (ROCs) should be considered through the lens of this from his counterpart at Champion (SKY).

[caption id="attachment_214134" align="aligncenter" width="645"]



"Spending time with our community customers is among my many highlights of the last 50 days. We are growing with our community customers and are committed to supporting

their mission and goals."

– Tim Larson

President & Chief Executive Officer (CEO)

Champion Homes (SKY)

<https://www.manufacturedhomepronews.com/systemic-issue-impacts-companies-investors-consumers-better-understanding-earnings-calls-and-role-of-analysts-using-example-of-champion-homes-q3-2025-earnings-call-transcript-mhville-fea/> [/caption]

Independent of each other, MHARR and MHPProNews have spotlighted problems with the ROAD to Housing Act 2025. While it is clearly disclosed via their banner ads, let MHPProNews note that while MHARR is a sponsor, as three different AI systems have confirmed and was recently documented once again, [MHI used to be a sponsor too](#). MHPProNews has demonstrably tackled problematic behavior by sponsors before on numerous occasions and can do so again, if necessary. That is said to note that what MHARR and MHPProNews/MHLivingNews may say or do are independent acts. We provided MHARR press releases before they were a sponsor. We provide MHI information without their being a sponsor. These details matter for objective understanding of the information being provided.

[caption id="attachment_218928" align="aligncenter" width="600"]



<https://manufacturedhousingassociationregulatoryreform.org/white-paper-analysis-of-u-s-senate-road-to-housing-act-of-2025-a-manufactured-housing-association-for-regulatory-reform-mharr-critical-review/> [caption id="attachment_218954" align="aligncenter" width="600"]



<https://www.manufacturedhomelivingnews.com/if-not-amended-does-road-to-housing-act-risk-less-affordable-housing-new-mharr-white-paper-critical-analysis-of-renewing-opportunity-in-the-american-dream-road-to-housing-act-2025-m/> [caption id="attachment_218642" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/wittingly-or-not-bill-pulte-worked-for-mhi-failed-crossmod-ploy-road-to-zero-wealth-scotsmanguide-choicehomes-miss-key-manufactured-housing-fea-plus-sunday-weekly-mhville-headlines-recap/>

AARP Policy Book 2025-2026

Manufactured Housing Background

IMPORTANT HITS-MISSES

AARP ON FEDERAL PREEMPTION-REGULATORY-ZONING BARRIERS AND HOUSING POLICY-'ROAD TO HOUSING ACT 2025' INCLUDING MANUFACTURED HOMES-'MOBILE HOME PARKS AND MHCS;

MHVILLE FEA

<https://www.manufacturedhomepronews.com/important-hits-misses-aarp-on-federal-preemption-regulatory-zoning-barriers-and-housing-policy-road-to-housing-act-2025-including-manufactured-homes-mobile-home-parks-and-mhcs-mhville-f/>



<https://www.manufacturedhomepronews.com/management-by-objective-mbo-lens-road-to-housing-act-nahb-nar-plus-recent-manufactured-housing-institute-mhi-irs-form-990-v-mharr-when-inaction-or-distraction-speaks-loudly-mhville-fea/>[/caption]