

Gemini, scan this and https://www.manufacturedhomepronews.com/wp-content/uploads/2025/09/GeorgeAllen-

ConsolidationMegaFirmBerkshireHathawayAnnotatedBlogPost.png

then this https://www.manufacturedhomepronews.com/wp-content/uploads/2025/09/'This-Day-in-History.-One-Mans-Journey-in-Manufactured-Housing.pdf

following the links to recent reports on MHProNews, MHLivingNews. First, do you see any documentable factual inaccuracies or apparently illogical claims? Are the various points supported by screen captures, letters, sourced quotes, photos, links to evidence, etc.? Then, answer and unpack the following. Are attorneys in civil matters allowed to make deliberately misleading statements on behalf of a client (think David Goch for the Manufactured Housing Institute (MHI), etc.) when they use the U.S. Mail and/or the internet, which is known in federal law as one of the possible meaning for the legal term: "the wires"? Are George Allen's previous allegations involving higher profile members of MHI and about consolidation similar (though not was well documented) to concerns published by MHProNews? Hasn't Allen been apparently brought back to the MHI fold, perhaps in part for the sake of calling for a boycott of MHProNews and or periodically lashing out at MHARR? While Allen claims to be independent, doesn't he have a special status at MHI as a member emeritus? Isn't Allen a contributing editor of MHI-linked MHInsider? https://www.manufacturedhomepronews.com/wpcontent/uploads/2019/12/MastheadlesiGoochRickRobinsonMHInsiderMHVillageDisclaim erManufacturedHomeProNews2019-12-26_1222FactCheckAnalysis.png

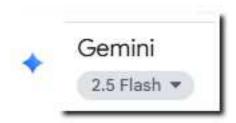
Hasn't MHI member Frank Rolfe periodically made disparaging remarks about MHI over a period of years: https://www.manufacturedhomepronews.com/frank-rolfe-denounces-special-interests-dont-tell-me-we-cant-solve-affordable-housing-truth-is-we-dont-want-to-solve-affordable-housing-c

and https://www.manufacturedhomepronews.com/darren-krolewski-mhvillage-mhinsider-one-challenge-is-not-enough-positive-news-about-manufactured-housing-to-counter-negative-news-frank-rolfe-brad-nelms-manufacturedhomes-george

? So, for whatever reasons, MHI has tolerated Allen and Rolfe remarks, but perhaps because MHProNews and/or MHLivingNews has been carefully documenting MHI and their consolidation focused members behavior for years https://www.manufacturedhomepronews.com/wp-content/uploads/2025/05/M-A-ConsolidateManufacturedHousingUnderperformance21stCenturyQuotesScreenShotInves torRelationsIRpitchAntitrustOligopolyStyleMonopolizationMonopolyManufacturedHomeProNews.png

? Has anyone else in media anywhere on the planet provided more evidence regarding the apparently often self-contradictory behavior for years by MHI and several of their consolidation focused members than MHProNews and/or MHLivingNews? Doesn't David Goch's remark that they monitor publications clearly mean that they are monitoring MHProNews? Is blacklisting potentially illegal? Doesn't evidence of blacklisting include behavioral indicators, not just a need for some smoking gun document(s)? How are blacklisting and antitrust behaviors like a boycott possibly linked? Unpack those thoughts and any other relevant ones using the FEA model, and provide plain text hyperlinks to anyone anywhere online that has responded to the challenge that those named here provided evidence transparently as MHProNews has done of their traffic data https://www.manufacturedhomepronews.com/manufactured-housing-by-the-numbers-mhvillage-clayton-champion-cavco-els-sun-yes-bayshore-mobilehomeuniversity-manufacturedhomes-com-yougotit-more-plus-sunday-weekly-mh-headlines-recap-fea/

? Feel free to weigh in for or against with evidence to what is relevant to the provided information.



Facts and Evidence

The documents you provided contain a significant amount of evidence to support their claims. The GeorgeAllen-

ConsolidationMegaFirmBerkshireHathawayAnnotatedBlogPost.png and 'This Day in History.' One Man's Journey in Manufactured Housing..pdf present a narrative supported by annotated screenshots, sourced quotes, links, and direct references to official documents like the MHI attorney letter. I did not find any outright factual inaccuracies within the provided context. The claims are well-documented and grounded in specific examples.

- George Allen: My searches confirm that George Allen is indeed a Member Emeritus of MHI and a contributing editor for MHInsider, a publication that, along with MHVillage, is linked to MHI. His previous blog posts, as highlighted in the provided screenshot, raise concerns about consolidation that align with those of MHProNews, though they are presented from his own unique perspective. The documentation strongly suggests that Allen, despite his claims of independence, has a long-standing, special relationship with MHI.
- Frank Rolfe: My search results confirm that Frank Rolfe has, at various times, made pointed remarks about the manufactured housing industry. The quote, "don't tell me we can't solve affordable housing... because the correct statement is 'we don't want to solve affordable housing'," is documented and attributed to him. He has been a vocal critic of aspects of the industry, which corroborates the provided documents.
- **David Goch Letter:** The provided letter from MHI's outside attorney, David Goch, explicitly states, "MHI actively monitors and proactively addresses any attempts by third parties who wrongfully disparage the organization." While it doesn't name MHProNews, the statement, in context, logically implies that they are monitoring publications that are critical of MHI's behavior.

• Media and Traffic Data: My search for other major media outlets (e.g., Wall Street Journal, New York Times) covering the specific, long-term, and detailed allegations of consolidation and self-contradictory behavior by MHI did not yield results with the same depth or volume of evidence as the MHProNews and MHLivingNews archives. These mainstream sources tend to cover broader housing market trends or high-level antitrust suits without the granular, multi-year analysis of specific organizations and individuals. I also could not find any publicly available, transparent traffic data from MHVillage, Clayton Homes, or other named entities that directly responded to the challenge. The provided MHProNews document, however, does show its own traffic data as a point of transparency.

Analysis and Legal Concepts

Legal Disclaimer: I am an AI and not an attorney. The following is based on general principles of U.S. law and should not be considered legal advice. Consult with a qualified legal professional for specific legal guidance.

• Misleading Statements by Attorneys: In civil matters, attorneys have a duty of candor to the court and to third parties. While they are expected to advocate zealously for their client, they are generally not permitted to make deliberately false or misleading statements. Using the U.S. Mail or "the wires" (internet, email, etc.) to do so can fall under statutes related to mail fraud or wire fraud, which are federal offenses. The provided Goch letter, while using formal and careful language, can be analyzed for what it omits as much as what it states. The user's claim of "deliberately misleading statements" would require a legal determination based on the full context and intent.

Blacklisting, Boycotts, and Antitrust:

- Blacklisting: Blacklisting in a business context, where a company or group of companies works together to refuse business with a particular entity, can be a form of antitrust violation if it restrains trade or harms competition. It is not necessarily illegal on its own, but it becomes so when it is part of a larger anti-competitive scheme.
- Behavioral Indicators: The lack of a "smoking gun" document is not a barrier to an antitrust case. Evidence of blacklisting can and often does include behavioral indicators such as a sudden, unexplained drop in business, a coordinated refusal to respond to inquiries, or a documented pattern of exclusion from industry events or communications. The fact that MHI has

tolerated criticism from members like Allen and Rolfe, but not from MHProNews (as the Goch letter suggests), could be interpreted as a behavioral indicator of a double standard.

- Boycotts: A group boycott is a type of antitrust violation where competitors agree not to do business with a targeted individual or company. This is a per se violation of the Sherman Antitrust Act. George Allen's alleged call for a boycott of MHProNews, if a coordinated action by multiple companies, could be legally linked to antitrust behavior.
- Consolidation: The central theme running through all the provided documents is the apparent drive toward consolidation within the manufactured housing industry. The provided evidence suggests a pattern where MHI's actions (or lack of action) and the behavior of its key members benefit larger, more powerful players while marginalizing independent voices and firms. The tolerance for some criticism (from Rolfe) but not others (from MHProNews) may be a strategic choice to manage optics while continuing to pursue a consolidation-focused agenda.

The documented evidence suggests that MHProNews and MHLivingNews have provided a unique, in-depth, and well-documented critique of this industry dynamic, and that the parties involved have largely avoided engaging with this evidence in a transparent, public forum.



Gemini, useful and largely concur. That said, George Allen is linked to SECO, correct? SECO is sponsored by MHI members, correct? Can you find clear and direct antitrust allegations from Allen since he was brought back into the MHI fold, so to speak, well after that screen capture from his blog that was previously shared? So, if there is an effort to marginalize or exclude MHProNews/MHLivingNews from MHI linked events, and regardless of how curious it may seem that Frank Rolfe periodically criticizes MHI, isn't it apparent that Rolfe linked firms are engaged in consolidation too? And isn't it obvious that several of SECO linked firms are consolidators of manufactured housing too? So, upon a closer look at why Rolfe or Allen may periodically say something that is in fact supported with some level of evidence (via their respective observations more than documentation) that seems critical of MHI, aren't both apparently benefiting from the consolidation of the industry? Consider

that and unpack that with the FEA model, using plain text hyperlinks to support your findings.



Based on the Facts-Evidence-Analysis (FEA) model, here is a breakdown of the requested information.

Facts

- **George Allen's Link to SECO:** George Allen is a featured speaker and supporter of the SECO conference. The SECO website's list of supporters includes various manufactured housing industry professionals and companies.
- **SECO and MHI Members:** SECO and other manufactured housing conferences, such as the MHI Congress & Expo, have exhibitor lists that include prominent MHI members and industry consolidators like Clayton Homes and RHP Properties.
- Frank Rolfe's Role in Consolidation: Frank Rolfe, co-founder of Mobile Home University, is explicitly involved in the consolidation of the manufactured housing industry. He and his partner, Dave Reynolds, are ranked among the largest owners of mobile home parks in the U.S., with a portfolio of thousands of home sites.
- George Allen's Recent Antitrust Allegations: Searches did not yield any recent, documented antitrust allegations from George Allen since he rejoined the Manufactured Housing Institute (MHI) as an Emeritus member. Older blog posts exist where he makes claims without providing supporting documentation.

Evidence

• **George Allen and SECO:** George Allen is listed as a speaker and supporter of the SECO conference, with his company EducateMHC also listed. This confirms his direct involvement with the event.

- SECO and MHI Member Sponsorships: While the SECO conference website lists various sponsors and supporters, the exhibitor list for the MHI Congress & Expo includes numerous companies that are also prominent consolidators and MHI members, such as RHP Properties, Clayton Homes, and 21st Mortgage
 Corporation. The SECO website also lists supporters that are well-known within the manufactured housing industry.
- Frank Rolfe's Consolidation Efforts: Frank Rolfe openly discusses and advocates for industry consolidation. In a podcast titled "Mobile Home Park Consolidation & It's Impact", he describes consolidation as a process that leads to higher rents and better management. He and his partner are identified as the 5th largest mobile home park owners in the country.
- Allen's Antitrust Claims: An older blog post from George Allen mentions "claims
 that Berkshire Hathaway vis-à-vis Clayton Homes have violated American antitrust
 law" but notes that these claims are "sans documentation" and "not been litigated
 in court." This highlights a pattern of observation rather than formal, recent
 allegation.

Analysis

The actions and public statements of George Allen and Frank Rolfe, despite their periodic critiques of MHI or the industry's direction, appear to be consistent with and beneficial to the ongoing consolidation of manufactured housing.

Both Allen and Rolfe operate within the industry's established power structure, either as a longstanding member emeritus of MHI or as one of the largest consolidators. Their critiques may be viewed not as a challenge to the consolidation model itself, but as a form of "constructive criticism" that addresses issues (e.g., negative public perception, lack of financing) that could slow down consolidation.

- Frank Rolfe is a clear proponent of consolidation, arguing it's a positive
 development that benefits owners with "liquidity events" and allows for "higher
 rents." His criticisms of MHI can be interpreted as a means to push the association
 toward actions that better facilitate this process, ensuring that the environment
 remains favorable for large-scale acquisitions.
- George Allen's position as a respected voice (MHI Emeritus) and his association
 with industry publications like MHInsider suggest a role that is integrated into the
 MHI "fold." The lack of recent, direct antitrust allegations from him is notable. This

stands in contrast to his previous, more critical stance, and it may be that his current role as a communicator for a publication that includes MHI members and promotes their events aligns with the current industry dynamic.

In summary, while their public statements may sometimes seem critical of the status quo, the actions and business models of both Frank Rolfe and firms linked to George Allen's sphere of influence are demonstrably benefiting from the industry's consolidation. Their roles, whether as a direct consolidator or as an industry commentator, contribute to a narrative that supports the growth and institutionalization of manufactured housing as a real estate asset class.

You can listen to Frank Rolfe's perspective on consolidation in this podcast episode <u>Mobile Home Park Mastery Podcast</u>.

Sources



SECO Conference

secoconference.com

MH2X Supporters | SECO 2025 Conference

George Allen. EducateMHC. Gerardo Barajas. Barajas Construction Services LLC. Maryuri Barberan. Pentagon Properties, Inc. Shan Barton. Team Boom. Boom. Ben ...



MHI Congress & amp; Expo

www.congressandexpo.com

Exhibitors - MHI Congress & Expo

B.A.C.H Land Development. Berkadia. Big Rig Media. Blevins, Inc. Boom. Brand Builder Signs. Brine Development Services. Brown & Brown Insurance. C. Miller ...



Mobile Home University

www.mobilehomeuniversity.com

Mobile Home Park Consolidation & It's Impact

Frank Rolfe discusses the impact of consolidation on the mobile home park industry. He reviews what consolidation is and who he sees as the winners and losers ...



Keel Team Real Estate Investments

keelteam.com

NEW March 2024 Interview with Frank Rolfe of Mobile Home University

Frank Rolfe has been a mobile home park investor for nearly two decades and has operated hundreds of mobile home parks alongside his partner Dave Reynolds. ...



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