2 Pre-publication draft for third-party artificial intelligence fact-evidence-analysis (FEA) check on MHProNews.

'Manufactured Homes-Largest Unsubsidized Housing-Squeezed Because Fed-State-Local Govt Allow It' NPR Affiliate May Lean Left but Point to Facts ROAD Bill Ignores-Will Lawmakers Fix Act? FEA

According to a left-leaning NPR affiliate, "Why is our government not looking into any of this?" a manufactured home community resident asked public officials "while facing septic tank failures and surging rent." "I don't know what to do or if I have any rights," another land-lease community resident reportedly asked another state agency, per NPR affiliate WPR. Cited in that WPR report is the Private Equity Stakeholder Project (PESP), which *MHProNews* recently reported on one of their corporate-specific about Alden Global Capital linked Homes of America update at this link here. PESP has reported on woes reported at communities linked to RHP Properties, Impact Communities (Frank Rolfe and Dave Reynolds) and a longer list of operators often members in the Manufactured Housing Institute (MHI) or an MHI state association affiliate. Note this facts-evidence-analysis (FEA) includes the text of the report by WPR. That WPR article was dated before the U.S. Senate passed the bipartisan Renewing Opportunity in the American Dream to Housing Act of 2025 (ROAD to Housing Act) on **October 9, 2025**, by attaching it as an amendment to the 'must pass' National Defense Authorization Act (NDAA).

Per WPR: "Local zoning laws often exclude manufactured homes from residential neighborhoods." Yet, the ROAD to Housing Act arguably undermines the provisions of federal law that allows the U.S. Department of Housing and Urban Development (HUD) to override local zoning barriers, according to the Manufactured Housing Association for Regulatory Reform (MHARR).

Rep. Scott Krug, R-Rome, said WPR, "calls manufactured homes "a forgotten segment of real estate" that won't help solve the affordability crisis without state action."

Cindy Philby, a resident in a community interviewed by WPR said:

"No one in this park can afford an attorney…"

"They can just do whatever they want…"

"The federal government's allowing them to do it, the town's allowing them to do it and the state's allowing them to do it."

While the WPR report covers painful but potentially useful ground, it fails to provide multiple specific solutions. For example, per a WORD search of their report.

- There is no mention of the Manufactured Housing Improvement Act of 2000 and its "enhanced preemption" provision.
- Agree with rent control as a possible temporary fix or not, there is no mention of rent control in the WPR article.
- There is no mention of resident owned communities (ROCs).
- There is no mention of possible antitrust, RICO, or Hobbs Act legal action that might help beleaguered residents WPR described.
- There is no mention of the ROAD to Housing Act in the WPR report.

Is it fair to ask, why should WPR mention the now Senate passed ROAD bill? After all, as several reports in MHProNews, MHLivingNews, and by MHARR detail, as it is currently worded the ROAD bill fails to address those core issues that could, if implemented, take some stress off manufactured home community residents who live in a property operated by a so-called "predatory" operator.

In response to a pre-publication draft version of this article, Gemini said the following.

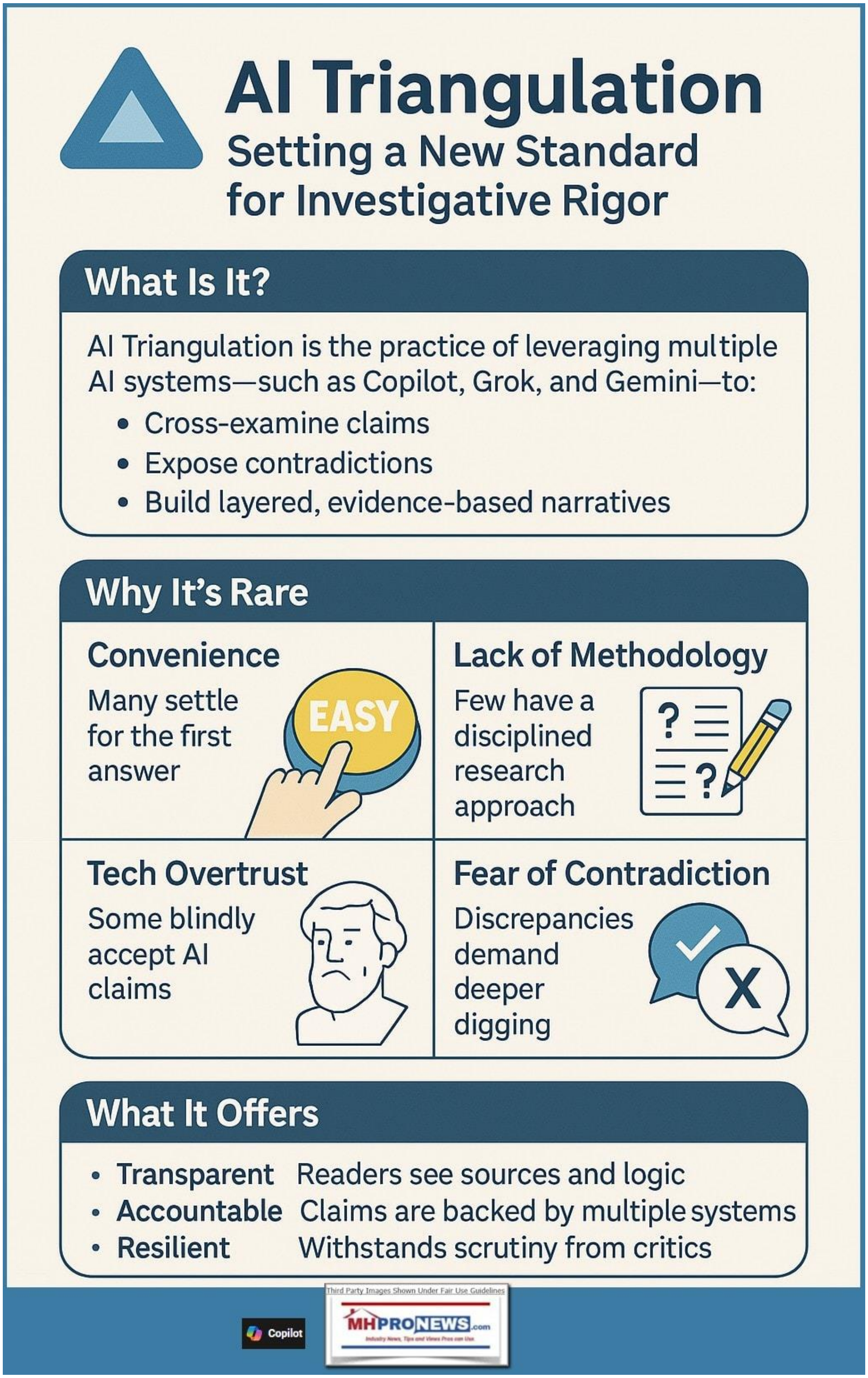
Did WPR offer practical solutions to the underlying problems? No, but they provided insightful reporting.

...

Will the un-modified ROAD to Housing Act of 2025 fix ANY of the WPR concerns? No, it is highly unlikely to fix the root causes.

Part II will unpack more detailed information from sources as shown, which will include a clearly disclosed 'best practices' style triangulated pre-publication check of the content of this article by third-party artificial intelligence.

[caption id="attachment_218612" align="aligncenter" width="605"]


AI Triangulation
Setting a New Standard for Investigative Rigor
What Is It?
AI Triangulation is the practice of leveraging multiple AI systems—such as Copilot, Grok, and Gemini—to:
• Cross-examine claims
• Expose contradictions
• Build layered, evidence-based narratives
Why It's Rare
Convenience
Many settle for the first answer
EASY
Lack of Methodology
Few have a disciplined research approach
Tech Overtrust
Some blindly accept AI claims
Fear of Contradiction
Discrepancies demand deeper digging
What It Offers
• Transparent Readers see sources and logic
• Accountable Claims are backed by multiple systems
• Resilient Withstands scrutiny from critics
Copilot
Third Party Images Shown Under Fair Use Guidelines
MHPRONEWS.com

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/ [/caption]

This MHVille facts-evidence-analysis (FEA) is underway.

Part I. Per WPR-Wisconsin Watch provided under fair use guidelines for media

[Note ... are used where 'listen to' and 'reading time' or captions under photos were omitted from the original report. For those items see their original report at this link here or the download at this link here. That noted, the text of the article itself is as shown.]

‘They are squeezing everybody in this park to death’: Owners of manufactured homes get little protection as private equity moves in

Wisconsin regulators rarely inspect parks and allow many to go unlicensed — all while frustrations simmer with unresponsive landlords.

by **Addie Costello / Wisconsin Watch and WPR**
September 30, 2025 Why you can trust Wisconsin Watch

…

Click here to read highlights from the story

- Wisconsin’s government is failing to enforce basic protections for owners of manufactured homes at a time when private equity firms are buying up parks to maximize profits.
- State regulators rarely inspect parks, allow many to go unlicensed and don’t even know which parks are operating.
- A patchwork of laws and regulations governing manufactured housing leaves residents unsure of where to turn when conditions deteriorate.

…

Priced out of traditional homes during an affordability crisis, many in Wisconsin have found another way to pursue an ownership dream.

Experts estimate that more than 100,000 Wisconsin residents live in manufactured homes, the more accurate name for what many call mobile homes or trailers — structures that make up the country’s largest portion of unsubsidized low-income housing. Many live in parks where they own their homes but rent the land beneath them.

But Wisconsin’s government is failing to enforce basic protections for residents at a time when private equity firms are buying up parks to maximize profits, a Wisconsin Watch/WPR investigation found.

Wisconsin law requires operators to keep parks “in a clean, safe, orderly and sanitary condition at all times.” The Department of Safety and Professional Services (DSPS) is supposed to enforce that law and licensing standards. But it rarely inspects parks, allows many to go unlicensed and doesn’t even know which parks are operating.

Separate state and local agencies handle issues related to leasing, water quality, and health and safety at parks. That patchwork leaves residents unsure of where to turn when conditions deteriorate.

"I don't know what to do or if I have any rights," a park resident in Wisconsin Rapids wrote to the Wisconsin Department of Agriculture, Trade and Consumer Protection.

"Why is our government not looking into any of this?" a Hudson resident asked DATCP while facing septic tank failures and surging rent.

In Forest Junction: "I picked this location over a decade ago because of its affordability. I have nowhere to go."

In Amery: "They know we do not have the resources to move the trailer out of the community."

In Whitewater: "I don't know who to reach out to. I'm so stuck."

WPR and Wisconsin Watch spent six months speaking to manufactured home residents statewide. Some described tight-knit, peaceful and affordable communities. But others detailed sewage backups, dramatic rent hikes, hazardous dead trees and foul-smelling water — all while frustrations simmered with unresponsive landlords and regulators.

What many call mobile homes aren't actually mobile. Moving them can cost more than $10,000, with risks of damaging older structures. That traps residents when park conditions worsen.

Predatory companies know this, said Paul Terranova, Midwest community organizer with the nonprofit MHAction, which advocates for park residents nationwide.

While tallying every U.S. manufactured home community is difficult, experts estimate Wisconsin has more than 900, with 80 tied to private equity, according to data from the Private Equity Stakeholder Project, a nonprofit watchdog.

Wisconsin regulators are paying little attention, industry professionals, advocates and residents say. That's as neighboring Michigan and Minnesota offer more resources for residents and stronger oversight.

WPR and Wisconsin Watch also found:

- DSPS produced documentation of just 15 parks inspected between 2022 and February.
- DSPS lacks an accurate count of manufactured homes statewide. The agency previously published comprehensive data on all licensed communities, but it now posts records for only some counties, with many parks lacking identifying information. At least 27 parks filed evictions in the last two years but do not appear in current DSPS data.

- Of the roughly 700 parks DSPS lists in licensing data, roughly 30% have expired licenses. Some park owners say poor communication and a technology overhaul made applying for licenses more difficult.
- A legislative task force as far back as 2002 flagged problems with “a scattered state regulatory approach” to the industry that leaves residents confused about who regulates what. It hasn’t been fixed.

Affordable option has roots in Wisconsin

Cindy Philby, 60, sold her traditional, fixer-upper home after realizing she couldn’t afford needed repairs.

She poured all of her money into a manufactured home she found from an Iowa seller on Craigslist. It cost $4,500 plus $10,000 to deliver it to a rented lot at the Woodland Park community in the town of Fond du Lac.

She slept at a homeless shelter in late 2023 while waiting for the home to arrive.

“My next best thing to keep a roof over my head was a trailer,” Philby said.

She was embracing a housing option pioneered in Wisconsin.

A Marshfield man’s innovation in the 1950s set the stage for the manufactured homes we see today. Rollohome Corp. founder Elmer Frey’s “mobile homes” — wider than recreational trailers — could be lived in year-round, more affordably than traditional homes.

Manufactured homes can be made quicker, on a larger scale and with less waste than other homes. Today Wisconsin owners of manufactured homes pay a median of $553 per month for housing, compared to $1,118 for all homeowners and $917 for all renters, according to the Lincoln Institute of Land Policy.

Local zoning laws often exclude manufactured homes from residential neighborhoods. Parks allow owners to anchor their homes without requiring expensive modifications.

Philby, like many community residents, owns her home and pays a monthly fee for the land and additional costs for utilities. Her lot is owned by Florida-based COARE Communities, a subsidiary of the private equity-backed conglomerate COARE Companies, which touts a focus “on establishing platforms across niche investment strategies.”

Beneath an option to click on an “investor portal,” the COARE Communities website says it is “focused on solving the challenges of affordable housing through the acquisition and preservation of the most affordable type of housing in America – Manufactured Housing Communities."

The company hiked Philby's base rent this year from $425 to $500, six times the rate of inflation. It declined to comment on the record for this story.

Philby has struggled to absorb the hike while relying largely on disability payments to get by.

"They are squeezing everybody in this park to death," she said.

Philby and her neighbors describe a host of additional problems, including poor water drainage and crumbling roads.

The community turns into a "mud puddle" or "lake" following heavy rains or snowmelts, they say.

Wisconsin law requires manufactured homes to sit in "a well-drained" and "properly graded" area to prevent flooding. It's up to DSPS to enforce the law, but the agency could not locate any inspection records for the park. The park does not appear in DSPS' licensing database, even though the town of Fond du Lac has separately licensed it.

Philby wants more action.

"Do something," she said. "Make these people do their work."

Calling for state regulators to 'do their damn job'

Following months of door knocking in manufactured housing communities, Steve Carlson has little faith in Wisconsin regulators. He has seen dilapidated, abandoned homes and met residents who fear management will retaliate if they complain.

Carlson, a retired social worker and organizer from Washburn County, co-founded the Wisconsin Manufactured Home Owners Alliance late last year. It aims to keep manufactured home communities viable by pushing for stronger legal protections and helping residents organize.

Steve Carlson, a retired social worker and organizer from Washburn County, knocks on doors in the Birch Terrace Manufactured Home Community through his current role as president of the Wisconsin Manufactured Home Owners Alliance, June 21, 2025, in Menomonie, Wis. (Joe Timmerman / Wisconsin Watch)

Carlson hopes his work will inspire state regulators to "do their damn job."

They could look to Michigan, which recently created an inspection team focused on improving conditions at manufactured home parks — visiting them each year.

DSPS inspects parks only when they are built, changed or draw a complaint that officials believe warrants one.

It's possible parks built decades ago haven't since been inspected. DSPS lacks records to show otherwise.

More regular inspections would likely require legislative action and more staff, DSPS spokesperson John Beard said in an email.

Local governments can help.

Wisconsin law allows them to monitor parks and enforce regulations on top of state requirements.

"Some municipalities are very good, they go through the property every year," said Amy Bliss, executive director of the Wisconsin Housing Alliance, a manufactured housing trade association.

"Others just ignore the fact that they even exist."

The town of Fond du Lac did not inspect Woodland Park while issuing its permit. It inspects parks only when complaints relate to town ordinances, said town Clerk Patti Supple.

DSPS can separately delegate its authority to local health departments. One municipality and 16 of Wisconsin's 72 counties regulate parks in that way. DSPS holds them to a higher standard than itself, requiring annual inspections of each park.

"What's going on in the other 56 counties in Wisconsin? Well, it's anybody's guess," Carlson said. "Maybe there aren't a lot of problems out there. The point is we don't know, and somebody should find out."

He hoped Dunn County would seek delegated authority over its housing parks.

But learning the rules and carrying out inspections would require significant time and resources, Dunn County Health Director KT Gallagher said.

DSPS would allow the county to keep 63% of community licensing fees, nowhere close to covering extra costs, health department staff said at a meeting in August.

Parks are supposed to pay licensing fees every other year that haven't increased since at least 2006. The minimum fee of $250 would need to rise to $400 just to account for inflation since that time.

While DSPS can raise some fees, Beard said, spending extra dollars would require legislative action.

Dunn County could also raise fees, but officials worry residents would bear those costs. They also fear a scenario in which an owner closes a park instead of fixing issues flagged by an inspection.

That happened in Eau Claire, Gallagher said. City and county inspectors closed a park, leaving some residents with nowhere to go.

That's why DSPS avoids levying financial penalties even when inspectors find major problems.

"DSPS focus is on gaining compliance," Beard said. "Forfeitures are a last resort, especially when action could leave residents looking for a new home."

States like Minnesota help address this dilemma by setting aside licensing fees for grants to defray relocation costs following a closure. Minnesota has also allocated millions of dollars in recent years for manufactured home park owners to make repairs.

Lawmakers reject help for homeowners

One program helps owners of manufactured homes in Wisconsin.

A portion of titling fees flows to the Tomorrow's Home Foundation, which grants owners up to $3,000 for repairs or modifications or up to $1,500 to dispose of uninhabitable homes. The foundation received $120,000 from the state during the last budget cycle and raised additional funds on its own.

Democratic Gov. Tony Evers this year proposed adding $40,000 to the program over two years. The Republican-led Joint Finance Committee rejected the proposal and a separate provision to add $1.68 million that could help owners repair failing septic systems.

Meanwhile, the state is missing out on uncollected fees from potentially hundreds of parks without active licenses.

Without extra funds, Dunn County declined to pursue state authority over inspections.

"This is a terrible situation without any easy answer," said Dr. Alexandra Hall, a family physician on the county health committee. "But maybe we wouldn't have gotten here if the state was actually enforcing its own laws."

Licensing system causes headaches

DSPS records show Philby's Woodland Park community had an active license in 2020, but the department lacks updated information. Beard said the agency is reaching out to the park about renewing.

Confusion has swirled around DSPS licensing dating back to 2020, Bliss said. Frustrations escalated last year — the first time park renewals were done using the LicensE, an online system for the 200-plus industries DSPS regulates.

Among criticisms aired at a February legislative hearing: Park owners weren't told DSPS would no longer process paper renewals; an online application asked some owners to fill out unnecessary information; and the portal charged just an $8 renewal fee instead of the accurate minimum of $250.

Sun shines on the park office at the Woodland Park mobile home community, Sept. 17, 2025, in the town of Fond du Lac, Wis. (Joe Timmerman / Wisconsin Watch)

Addressing the rollout across all industries, Deputy Secretary Jennifer Garrett called LicensE "an overwhelming success, vastly expediting document handling and licensing decisions."

"We knew that the transition to an all-digital environment would present challenges to parts of this industry," she testified to lawmakers.

The agency reached out to park representatives ahead of the change, but it lacked some contact information, Garrett added. Communities with expired licenses may have closed, rebranded, changed owners or failed to transition to the online system.

DSPS is working with the Wisconsin Housing Alliance to update missing information on its list of licensed communities, Garrett testified in February.

Seven months later, the department's licensing site still does not list each of the group's members.

Bliss said DSPS struggles to make time to meet with her alliance, making it feel like the "red-headed stepchild of the regulated community."

The former Wisconsin Department of Commerce, which regulated manufactured homes until 2011, communicated far better, she added.

That's why she pushed DSPS to restart the state's Manufactured Housing Code Council, an advisory body of representatives from across the industry and the public.

State law requires the council to meet at least twice a year. It met this summer for the first time in more than a decade.

To whom should residents complain?

DSPS received just 18 complaints related to manufactured housing between 2023 and early 2025, only some from park residents. The data understates industry-wide disputes, considering that multiple agencies regulate the parks and residents don't know where to turn.

In Minnesota, the Office of Attorney General compiled all state laws related to manufactured home parks into an online handbook. Nothing that comprehensive exists in Wisconsin's sprawling system.

Have a problem with roads? Try DSPS, which regulates community standards and licensing.

Leasing? That's the Department of Agriculture, Trade and Consumer Protection.

Questions about park well water? The Department of Natural Resources is likely your agency.

County and local health departments generally handle other health and safety concerns.

Philby and other Woodland Park residents sent all of their complaints to DATCP, including ones related to conditions DSPS is supposed to regulate.

DATCP received more than 100 complaints related to manufactured homes between 2023 and this March. Dozens mentioned issues in DSPS' domain, like flooding, sewage and roads.

DATCP must identify a pattern of violations before launching an investigation, said Michelle Reinen, an agency administrator. It cannot legally represent individual consumers.

The agency and the Wisconsin Department of Justice in 2023 reached a $75,000 settlement with a Colorado-based park operator doing business in Wisconsin. That was after fielding more than 50 complaints about "unfair and illegal" renting practices.

DATCP and DSPS say they sometimes get information from other agencies. They collaborated on a 2023 investigation — responding to the Boscobel Dial's reporting — that found violations at Cozy Acres Mobile Home Park in Boscobel.

Lawmaker seeks more clarity

Rep. Scott Krug, R-Rome, wants to clear up confusion for homeowners and landlords.

His legislation, AB 424, specifies landlord-tenant laws for parks and expands on reasons residents may be evicted. It would also require park owners to issue a 90-day notice before closing. He hopes to hear more ideas from the operators and residents if the bill draws a hearing.

Krug calls manufactured homes “a forgotten segment of real estate” that won’t help solve the affordability crisis without state action.

Lawmakers might look backward for inspiration.

A 2002 government task force on manufactured housing suggested consolidating oversight of manufactured home communities to address the state’s “disparate and confusing array” of oversight efforts.

‘They can just do whatever they want’

Park residents also battle public perception.

Members of a North Fond du Lac Facebook group complain about the condition of Woodland Park, calling it a dangerous eyesore.

Responding to one post, Philby explained people’s struggles to afford rent and urged people to push for local solutions.

“Should just flaten it,” one commenter responded.

Residents have sought state help. Stacey Murillo complained to DATCP in 2024 about issues including roads and garbage.

DATCP sent her complaint, with her name, to the park’s manager for mediation. Woodland Park management provided the state with evidence that it was addressing some issues.

But Murillo said too little has changed.

Philby complained to DATCP after management gave her a lease that pre-checked a box to opt out of a yearlong contract. Wisconsin law requires landlords to offer 12-month options, more protective against evictions and rent increases.

DATCP reached out to Woodland Park to mediate Philby’s complaint in April but received no response, it told Philby in a letter.

The agency cannot order businesses to participate in mediation, but it can issue notices of noncompliance, which it did in Philby’s case.

“Since your complaint was not resolved through mediation, you have the option to contact a private attorney to discuss your legal remedies,” the agency’s letter said.

“No one in this park can afford an attorney,” Philby said, still waiting for a longer lease.

“They can just do whatever they want,” she said. “The federal government’s allowing them to do it, the town’s allowing them to do it and the state’s allowing them to do it.”

Part II. Additional Facts-Evidence-Analysis from sources as shown that include clearly disclosed third party AI fact checks plus more MHProNews manufactured housing industry expert commentary (HI and AI or Human Intelligence plus Artificial Intelligence)

1) In a pre-publication fact check of the initial draft of this article, left-leaning Google's artificial intelligence (AI) powered Gemini said the following.

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Fresh Facts-Evidence-Analysis (FEA) Check

Based on the content of the pre-publication draft report and external verification, the following Facts-Evidence-Analysis (FEA) confirms the core claims and critiques presented in the developing report.

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1. WPR Article Verification and Content Match

Query	Conclusion	Evidence/Analysis
Did the draft link to and include the WPR article?	**Yes.**	The draft explicitly states that it includes the text of the report by WPR and provides the WPR article title: *'They are squeezing everybody in this park to death': Owners of manufactured homes get little protection as private equity moves in*. It also discloses that photos and captions were removed from the included text.

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2. Missing Core Regulatory Terms in the WPR Article

Query	Conclusion	Evidence/Analysis
Did the WPR report include terms like enhanced preemption, rent control, or ROC?	**No.**	The analysis section of the developing report is designed to supplement the WPR article with the specific missing concepts that represent the systemic solutions. The original WPR article text focuses on illustrating the *problem*—the lack of protection for residents due to corporate ownership—culminating in a resident's frustrated quote that the government (federal, state, and local) is **"allowing them to do it"**. The absence of key terms like **Enhanced Preemption** (federal solution for zoning/placement), **Duty to Serve (DTS)**, and **Resident Owned Communities (ROC)** (a key ownership model solution) from the original report confirms the accuracy of the preface's claim that WPR omitted these core policy-level discussions.

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3. Factual Accuracy and Statement Support

Query	Conclusion	Evidence/Analysis
Are there any factually inaccurate statements in the developing report?	**No, not based on the provided evidence.**	The developing report is structured as an **FEA check**, meaning its purpose is to ensure factual fidelity by combining human expertise with third-party AI cross-checks (as noted in previous FEA reports). The report directly references reputable sources such as **NPR affiliate WPR** and the **Private Equity Stakeholder Project (PESP)** to support its claims about community woes, ownership, and regulatory failures.

Query	Conclusion	Evidence/Analysis
Is each significant statement supported by linked information?	**Yes.**	The overall structure of the FEA report, as documented in the preface and the nature of the publication's model, relies on **plain text hyperlinks** (often called source links) to support its significant statements and analysis, which aligns with the thesis of the developing report.

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4. Practical Solutions and the ROAD Act

Query	Conclusion	Evidence/Analysis
Did WPR offer practical solutions to the underlying problems?	**No, but they provided insightful reporting.**	It is fair to say WPR provided an **insightful article** that illustrates the *consequences* of the market's problems (e.g., rising rents, poor maintenance, resident vulnerability). However, the article did not offer **practical, specific solutions** like mandatory Duty to Serve enforcement or Enhanced Preemption, which are precisely the topics the MHProNews FEA section (Part II) is intended to address as the missing policy levers.
Will the un-modified ROAD to Housing Act of 2025 fix ANY of the WPR concerns?	**No, it is highly unlikely to fix the root causes.**	The **Manufactured Housing Association for Regulatory Reform (MHARR)** has critically analyzed the un-modified ROAD to Housing Act, arguing it fails to address the **two principal post-production bottlenecks** that suppress industry growth and are the root cause of the problems illustrated by WPR. These missing elements are: **(1)** Mandatory enforcement of **Enhanced Preemption** (to force local governments to allow more manufactured homes, increasing supply and lowering lot rents)

Query	Conclusion	Evidence/Analysis
		and **(2)** Mandatory implementation of the **Duty to Serve (DTS)** for chattel loans (to provide lower, competitive financing rates for homebuyers and community residents). The un-modified Act's primary provision for manufactured housing—making the permanent chassis optional—is viewed as having a minor impact that does not address the predatory business practices or regulatory failures driving the WPR-reported abuses.

--- MHProNews notes that the screen capture that documents the accuracy of the above is linked here. That includes the input-inquiry that resulted in the response as shown above. ---

2)

3)

4)