3 Pre-publication draft for 3rd party artificial intelligence (AI) fact check for developing report on MHProNews.



"It's unbelievable how much you don't know about the game you've been playing all your life." - Mickey Mantle, opening quote from the 'based on a true story' movie Moneyball. "Happy 16th Anniversary to MHProNews! Here's a featured image designed to celebrate this milestone, incorporating your ideas of the split panel, manufactured homes, fireworks, and a prominent "16th Anniversary" message." - Gemini. "What's past is prologue" is a quotation of William Shakespeare from his play The Tempest. In contemporary use, the phrase stands for the idea that history sets the context for the present," according to left-leaning Wikipedia. What follows isn't just a romp through the evolution of what launched as MHMarketingSalesManagement.com (MHMSM.com) and was later rebranded as ManufacturedHomeProNews.com (MHProNews.com or MHProNews). It also looks at the experience of Professor Esther Sullivan. It considers the Bostick and Fath families. It looks at Sam Landy and UMH Properties (UMH). It will look at John Oliver's viral Mobile Homes, the Manufactured Housing Institute, and the Manufactured Housing Association for Regulatory Reform (MHARR). It will consider remarks by Ishbel Dickens, once the Executive Director of the Manufactured Home Owners Association of America (MHOAA). MHProNews provides a unique lens through which critical parts of the history of manufactured housing in the 20th and 21st century can be considered. That will come into focus in the course of this MHVille facts-evidenceanalysis (FEA) report.

Many don't realize that there is a factory-built housing connection to the story of Tucker (the famous automaker). The plant he had for his firm later became the plant used by Lustron. Per Wikipedia: "Lustron houses are prefabricated enameled steel houses developed in the post-World War II era United States in response to the shortage of homes for returning G.I.s by Lustron Corporation and Chicago industrialist and inventor Carl Strandlund. Considered low-maintenance and extremely durable, they were expected to attract modern families who might not have the time for, or interest in, repairing and painting conventional wood and plaster houses. Lustron production ceased in 1950 due to the company's inability to pay back the startup loans it had received from the Reconstruction Finance Corporation. Over 2,000 homes were constructed during the Lustron's brief production period, and many remain in use today."

https://youtu.be/djMYTM1p318?si=063YDaTYdW6Qho2D

https://youtu.be/QOHe-e-dVNo?si=RU8lsBtGc4H-malC

So, this is more than a celebration of 16 years of publishing *MHProNews*. It is a reflection that can frame the headline topic of how a better and brighter future for the manufactured housing industry can be achieved. In order to understand the present, one must look back at the past and see how we got here.

[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]

To borrow from Mickey Mantle and Moneyball.

A better understanding of past performance - what happened and why - is how more runs are scored, and more games are won.

Sports teams watch game film to improve their practice sessions and improve game performance.

Lessons are learned from successes and failures alike through that review process.

The video clip above from 'based on a true story' Tucker is every bit as important as the video clip about Lustron homes. Better understanding the trailer house and mobile home industry of the past sheds light on the manufactured housing industry of the present and potential future. From their Dick Moore Housing company website: "Founded by Richard C. Moore, an RV/MH Hall of Fame inductee, we are one of the oldest manufactured housing retailers in America and have served more than 26,000 satisfied customers. Since 1958, we've been committed to leading the industry with quality, value, and exceptional service." That means Moore dates back to the trailer house era. The cold start opening quote by Dick Moore is powerful. Why isn't it used on the MHI website? The home the video was shot in is a MHARR member Sunshine Homes product.

https://vimeo.com/168408640

As Part II will reveal, the manufactured home industry is at a crossroads. It will either stay a niche industry, serving mostly in rural areas and replacing older homes in communities, or it will do something significant to achieve escape velocity.



From the Wikiquotes transcript of the Preston Tucker trail speech in the video above is as follows.

Preston Tucker

When I was a boy, I used to, uh, used to read all about <u>Edison</u> and the Wright Brothers, Mr. Ford. They were my heroes. 'Rags to Riches' - that's not just the name of a book. That's what this country was all about.

We invented the 'free enterprise' system, where anybody, no matter who he was, where he came from, what class he belonged to - if he came up with a better idea about anything, there's no limit to how far he could go.

I grew up a generation too late, I guess, because now the way the system works, the loner, the dreamer, the crackpot who comes up with some crazy idea that everybody laughs at, that later turns out to revolutionize the world - he's squashed from above before he even gets his head out of the water because the bureaucrats, they'd rather kill a new idea than let it rock the boat!

If Benjamin Franklin were alive today, he'd be thrown in jail for sailing a kite without a license! [jury laughs]

It's true! We're all puffed up with ourselves now 'cause we invented the bomb - dropped the - beat the daylights out of the Japanese, the Nazis.

But if big business closes the door on the little guy with a new idea, we're not only closing the door on progress, but we're sabotaging everything that we fought for!

Everything that the country stands for!!

And one day we're gonna find ourselves at the bottom of the heap instead of king of the hill, having no idea how we got there, buying our radios and our cars from our former enemies. [A juror laughs]

I don't believe that's gonna happen. I can't believe it because - if I ever stop believing in the plain 'ol common horse sense of the American people, be no way I could get out of bed in the morning. Thank you.

Following the check of the draft of this article linked <u>here</u>, part of what Gemini said in the <u>FEA check</u> was the following.

Obvious Marginalization

Yes, it is obvious that manufactured housing will remain a marginalized form of affordable housing without these key reforms.

...

Liability and Exposure

Yes, the inaction logically increases MHI board members' liability exposure.

The full remarks by Gemini and other third-party AI systems that review the various drafts of this report are found in Part III.

This <u>MHVille FEA</u> is underway.



Gemini, today marks year 16 (16th anniversary) of the launch of what is now called MHProNews. If you could make a featured image for that? Maybe have a panel...

Happy 16th Anniversary to MHProNews! Here's a featured image designed to celebrate this milestone, incorporating your ideas of the split panel, manufactured homes, fireworks, and a prominent "16th Anniversary" message.





Understanding 'Connecting the Dots' Analytical Journalism.



Images

Journalist Diana Dutsyk:



"Analytical journalism is the highest style of journalism."

"...the personal courage of the journalist is important, he should not be afraid to go against the bosses, should not call white black. He [the analytical journalist] cannot

distort the truth."



Griffins' Nest:

"News analysis are most often written by journalists with experience or

pinion vs. Analysis | The ... knowledge in a specific subject, qualifying them make observations based on the facts of a story."



Howard Walker, then Vice Chairman of Equity LifeStyle Properties (ELS) and longtime MHI Executive Committee member:

"The emergence of Tony Kovach's group of publications has brought a new standard of professionalism to the industry. The thorough and unbiased reporting fills the vacuum that has existed for too long. It's been refreshing to have these

communications serving the manufactured housing industry, and here's to their continued success."



MHPRONEWS com-

"There are many kinds of journalism, but at the heart of their constitutional responsibilities, journalists are in the business of monitoring and keeping a check on people and institutions in power."

- American Press Institute.

Part I

1) Via email to MHProNews.

Dear Tony, Soheyla and Tamas,

Please accept my sincere congratulations on the 16th anniversary of both of your publications, MHProNews and MHLivingNews.

Your unique style of journalism, added to your daring investigative reporting, which produces accurate and factual news about manufactured housing industry, combined with your most innovative and eye-catching graphics bring a breath of fresh air to our hardworking industry members who are starved for accurate and factual industry news and information, which literally are non-exitance from many of our industry's other news sources. I know it is not easy to be the tip of the spear of change doing what you have been doing the past sixteen years. But I also know that the rewarding aspect of your self-achievement and the corresponding self-respect makes the whole thing well worth it.

With my best wishes for continued success because without your presence on the scene accurate and factual reporting might become a rarity in this great industry,

DannyDannyD. Ghorbani

MHProNews notes that <u>Danny Ghorbani</u> is the Senior Advisor, founding <u>president and CEO</u> of <u>Manufactured Housing Association for Regulatory Reform</u> (MHARR), and former vice president for the Manufactured Housing Institute (MHI).

MHProNews replied to the above with a thank you message that drew the following response.

Tony, my Dear Friend,

It is the truth, as it is a complement from the heart and you deserve every bit of it.

Please say Hello to Soheyla and Tamas from Syl and me,

Danny

2) Flashback to October 2015.

"Congratulations on your upcoming milestone. I want to personally thank you for giving me one place for information to stay abreast of what is happening in the Manufactured Housing industry.

Best of continued success,

Mike"

Mike Bowen Senior National Accounts Sales Mgr/VP American Modern Insurance Group

3) Another 2015 flashback.

I appreciate being able to get all my MH news in one place, and especially on-line on my iPad as I am away from the office so often. Our industry is lucky to have such extensive coverage and I value the thoughtful coverage on a wide range of topics that MHProNews provides its readers.

Don Glisson, Jr, CEO
 Triad Financial Services, Inc.

With <u>Triad Financial Services</u> (now part of <u>ECN Capital</u>, then an independent manufactured home lender) in mind, in this flashback video to 2016 is Darrel Boyd, who was then a senior vice president with Triad. Boyd is the first interview to come on after the set up from the Louisville Show. Listen carefully to what Boyd said. If past is prologue, then the case can be made that several historic insights emerge from Boyd's remarks.

https://vimeo.com/153266894

- 4) Virtually everyone in that video above was a member of the Manufactured Housing Institute (MHI). More on that soon.
- 5) The next video was for <u>ManufacturedHomeLivingNews.com</u> (<u>MHLivingNews.com</u>), which launched in 2012.

As the name implies, *MHLivingNews* aimed to promote the manufactured home lifestyle, be it on privately owned land (such as 'fee simple' settings), as well as in land lease communities. Manufactured home communities (MHCs) included owned corporate, 'mom and pop' independents, and resident owned communities (ROCs). The next video was from Saddlebrook Farms near Kalamazoo, Michigan. John Caron and his team lined up multiple interviews with residents, local business professionals, and others with the goal of painting pictures from an array of perspectives that dispelled the common misconceptions about contemporary manufactured home living.

https://vimeo.com/174025966

Kim Capen is featured in the video made in tandem with ROC USA. Kapen is a resident in an ROC, as he explains in the next video. Kapen has since moved 'up the ranks,' so to speak, in the world of ROC USA.

https://vimeo.com/141006335?fl=pl&fe=sh

The above has clues into what was then the earlier days of so-called 'predatory' manufactured home community operators, which the ROC movement was partially a response to, offering land-lease community residents a possible solution by forming a cooperative and purchasing their property.

6) Not all corporations in manufactured housing are predatory. The updated MHProNews disclosure is linked here. At the time the next video was made, MHProNews had no financial stake in UMH Prosperities (UMH). As the disclosures document for MHProNews reveals, along with several other details, at this time the management of MHProNews has a position in UMH Properties. That noted, much of what was said in this now 10 year old video ought to be tremendously insightful for researchers, investors, and affordable housing advocates. It is a common sense set of remarks by UMH President Sam Landy explaining what happened with Dodd-Frank and why that choked off lending in the manufactured home industry. Landy told MHProNews/MHLivingNews why their successful and competitive lending program for manufactured homes had to be suspended. UMH pivoted to rentals instead. That meant people who might have become a homeowner were now instead renting a home from UMH. While profitable, it meant sales (and equity for home buyers) was effectively being denied. There is much more in what ought to be seen as literally another historic video.

https://vimeo.com/128215775

More on the MHI-backed <u>Preserving Access to Manufactured Housing Act here</u> and further below.

7) It should be recalled that 2009 was 'the bottom' of the manufactured home industry in its 21st century slide. This writer for *MHProNews* was a periodic contributor to the decade's long legacy of *Manufactured Home Merchandiser Magazine (MH Merchandiser)*. It was after the *Merchandiser* folded in the late summer of 2009 that the <u>Kovach family huddled</u> and decided to launch the industry's first serious ezine.

Table	
Year	New Manufactured Home (MH) Production
1995	344,930
1996	363,345
1997	353,686
1998	373,143
1999	348,075
2000	250,366
2001	193,120
2002	165,489
2003	130,815
2004	130,748
2005	146,881
2006	117,373
2007	95,752
2008	81,457
2009	49,683

2010	50,056
2011	51,618
2012	54,881
2013	60,228
2014	64,334
2015	70,544
2016	81,136
2017	92,902
2018	96,555
2019	94,615
2020	94,390
2021	105,772
2022	112,882
2023	89,169
2024	103,314

Notice that since 2009, the industry's downward trend reversed. Perhaps that was just a coincidence. But much of what was done in those early years was a kind of cheerleading, a rally to inspire manufactured housing industry professionals to focus on the reasons to believe that better days could be ahead.



From Chris Olvera, the last editor for the Merchandiser were the following words of encouragement to the then nascent project.



Chris Olvera Editor * Writer * Reporter * Proofreader



December 2, 2009, Chris worked with L. A. 'Tony' in different

Tony Kovach wrote freelance articles for me when I was with Manufactured Home Merchandiser and he always met deadlines and knew our audience. He is an excellent writer and his articles required very little work. He has a writing style that made you comfortable and at ease; like you could trust him and you can.

8) The reason Olvera said "he [Kovach] know our audience" is explained in part by the words from Al Cole at Oxford Bank, which provided manufactured home loans in their region.

[caption id="attachment_159060" align="aligncenter" width="504"]

"Tony "gets it" when it comes to manufactured housing. He has worked or been involved in almost all phases of the business."

Al Cole

Senior Vice President Oxford Bank and Trust via LinkedIn.

Image 1 "Tony "gets it"

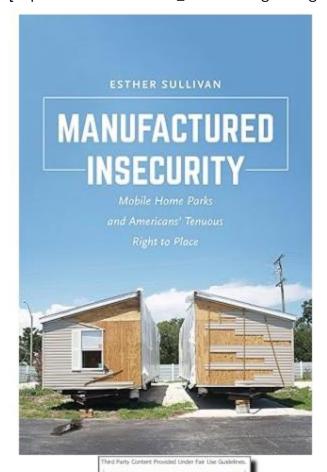
when it comes to manufactured housing. He has worked or been involved in almost all phases of the business." - Al Cole, then SVP, Oxford Bank. [/caption]

9) Professor Esther Sullivan is celebrated by many because she lived in a manufactured home in a manufactured home community for some two years. That gave her a 'unique' perspective in her research into manufactured home community living. Fair enough.

But then how much more perspective is gained when you've lived in a pre-HUD Code mobile home in a 'mom-and-pop' owned land lease as a resident?

How much more perspective is gained when you have been both a resident in a land lease as well as in management at multiple land lease properties? More on that after considering some items from Professor Sullivan's website.

[caption id="attachment_222553" align="alignleft" width="314"]



MHPRONEWS

Per Amazon: "Manufactured Insecurity:

Mobile Home Parks and Americans' Tenuous Right to Place." By Prof. Esther Sullivan.
"Manufactured Insecurity is the first book of its kind to provide an in-depth investigation of the social, legal, geospatial, and market forces that intersect to create housing insecurity for an entire class of low-income residents. Drawing on rich ethnographic data collected

before, during, and after mobile home park closures and community-wide evictions in Florida and Texas—the two states with the largest mobile home populations— Manufactured Insecurity forces social scientists and policymakers to respond to a fundamental question: how do the poor access and retain secure housing in the face of widespread poverty, deepening inequality, and scarce legal protection? With important contributions to urban sociology, housing studies, planning, and public policy, the book provides a broader understanding of inequality and social welfare in the United States today."[/caption]

"I am an Associate Professor of Sociology at the University of Colorado Denver and a Nonresident Fellow in the Housing Policy Finance Center at the Urban Institute.

. . .

My book Manufactured Insecurity: Mobile Home Parks and Americans' Tenuous Right to Place (winner of the 2019 Robert Park Award from the American Sociological Association) examines the social, legal, geospatial, and market forces that intersect to create housing insecurity for low-income residents in U.S. manufactured home parks. The book draws on two years of ethnographic data collected inside closing manufactured home communities before, during, and after community-wide evictions. I examine the political economy of the manufactured housing industry and the impact of manufactured housing insecurity on residents. I continue to publish on various aspects of housing insecurity as it relates to manufactured housing."

Sullivan has been hated by some in manufactured housing for what she has written and published. That is arguably a mistake. Why not engage with Sullivan and those like her instead? Why not understand what she said and why in *Manufactured Insecurity*, and if she is correct, acknowledge that and where she might have missed the mark, address those points too in an objective fashion?

[caption id="attachment_222554" align="aligncenter" width="376"]



Associate Professor of Sociology at

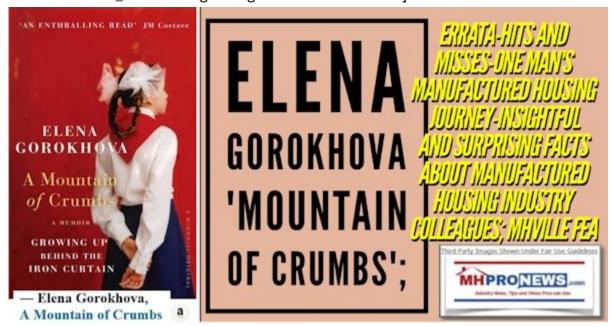
the University of Colorado Denver and a Nonresident Fellow in the Housing Policy Finance Center at the Urban Institute.[/caption]

10) As Olvera noted and to Cole observation, it is an advantage to *MHProNews* to have been directly involved in the sales of HUD Code manufactured homes to the public via so-called 'street retailers' as well as via in community sales in a land-lease property for years. It is no slam on would be rivals to say that there are those who publish or blog that have sold very few, if any, manufactured homes themselves. This writer's experience in selling manufactured homes dates back to the early 1980s.

[caption id="attachment_215589" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/one-mans-journey-into-the-u-s-affordable-housing-crisis-an-evidence-packed-tale-of-wonders-and-woes-featuring-the-manufactured-housing-industrys-potential-gone-wrong-mhville-fea/[/caption][caption id="attachment_218935" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/elena-gorokhova-mountain-of-crumbserrata-hits-and-misses-one-mans-manufactured-housing-journey-insightful-andsurprising-facts-about-manufactured-housing-industry-colleagues-mhville-fea/[/caption] There are those involved in manufactured home publishing that have never owned or lived in a manufactured home. Perhaps we should go easier on them, because what do they really know other than to repeat the party line as it is provided by MHI and their insider brands?

[caption id="attachment_214030" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/manufactured-housings-f-troop-laughable-reporting-on-serious-issues-by-subsidiary-of-publicly-traded-equity-lifestyle-properties-els-unpacking-mhinsider-state-of-the-industry-mhville-fea/ [/caption]

To understand why manufactured housing is not advancing one must first understand what the industry was doing when it was advancing. Go back to that table above that showed manufactured home production from 1995 to 2024. Who else in manufactured housing offers that fact-backed graphic? It is entirely possible that only *MHProNews* and *MHLivingNews* are the only ones.

[caption id="attachment_220168" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/facts-facts-facts-hit-them-with-facts-july-2025-mh-production-data-21st-ceo-tim-williams-invite-to-mhpronews-historicmanufactured-housing-institute-statements-omissions-trend/[/caption]

If MHI and their allied bloggers and publishers don't routinely (if ever) provide a reminder that the industry once produced over 500,000 new homes a year in the early 1970s, and more recently had exceeded 373,000 homes in 1998, then like an atrophied muscle, the industry's professionals get used to being 'stuck' around 100,000 units a year. That's called a rut.

[caption id="attachment_133281" align="aligncenter" width="575"]



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

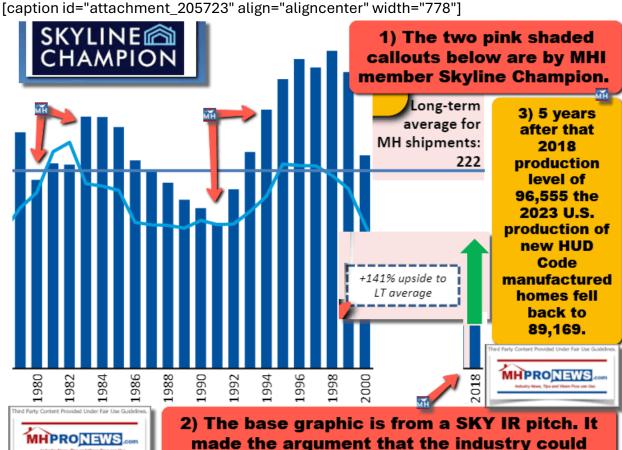
This is how MHI member Cavco Industries (CVCO) frames it. As if the industry began in 2007.

[caption id="attachment_219047" align="aligncenter" width="638"]



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]

11) This expanded image from a then Skyline Champion (still SKY as the stock ticker, but now Champion Homes) investor relations package is a reminder that in 2018, the industry averaged 222,000 shipments annually. That long-term average total keeps going lower and lower. Notice the two periods in the HUD Code era where manufactured home production rapidly ramped up



https://www.manufacturedhomepronews.com/cnn-poll-most-renters-cant-afford-to-buyhouse-yet-skyline-champion-insiders-are-only-selling-sky-shares-2nd-largestmanufactured-home-producer-in-2024-whats-up-frank-rolfe-remark/ [/caption]

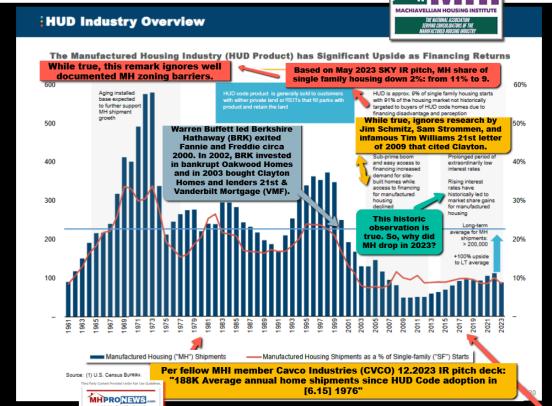
grow 141% from 2018 to historic LT average.

Facts and evidence combined with objective analysis are how some can learn how the industry moves from its 21st century doldrums to its true potential. Because there is an evidence-based case to be made the industry's 'leaders' that are in charge at MHI want the industry to stay small. It serves their self-stated business model. If someone wants to understand why stories like Sullivan's get told, or why videos like John Oliver's go viral, one must understand what the insiders at MHI are saying about themselves to their investors. Those public admissions bring clarity. Details and examples on that are found in Part II. Note that from 2018 to the graphic below that the average annual production had fallen per Champion Homes (SKY) by 22,000 units annually, from 222K to 200K.

[caption id="attachment_209244" align="aligncenter" width="601"]



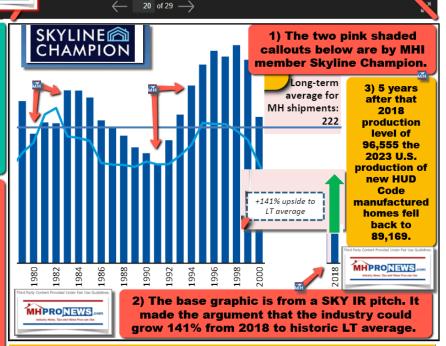




The lack of reference by SKY to the Manufactured Housing Improvement Act (a.k.a.: MHIA, 2000 Reform Law, 2000 Reform Act) raises concerns about Champion's corporate and similarly MHI's fiduciary responsibilities due to apparently missing material facts.

Champion reportedly has over '\$500 million in free cash.' They have multiple idled plants. They claim they want to grow organically and via acquisitions.

Why aren't they using their legal and financial resources to sue to get the 2000 Reform Law enforced? Especially post Loper Bright decision, the odds for success and increased opportunities for sales are per MHARR better.



ADU production in CA soared after statewide preemption kicked in. Similarly, if federal preemption under the 2000 Reform Law were enforced by HUD routinely manufactured housing production could soar nationally. That would ease affordable housing crisis. Enforcement could save tax dollars over time.

MHProNews 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]

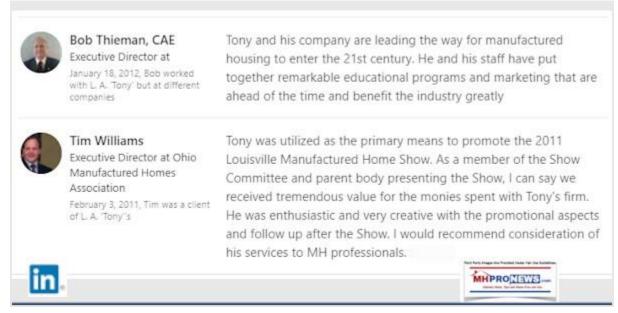
12) MHProNews' management have owned and lived in conventional housing in nice neighborhoods as well as in manufactured homes on privately owned land (fee simple) as well as in a land lease. Those too are advantages. If Sullivan is celebrated for living 2 years in various properties in Texas and Florida to experience the tenuous right to place for those facing closure of their properties, how much more relevant is it to have lived in communities in several locations in Oklahoma, Texas, Wisconsin, and Illinois, not to mention the scores visited from Maine to California, from Canada to Florida or Arizona, across the plains, in the Mid-Atlantic, and in dozens of states from coast-to-coast?

Which logically brings us to Sunshine Homes, whose founder John Bostick had the vision of buying and living in his own product. Not only do John and his wife live in one of their own factory-built homes, his daughter Lindsey Bostick also owns a HUD Code Sunshine built manufactured home. The video below is a montage of clips including a realtor praising her manufactured home, to Lindsey, and others, including drone footage which at the time was cutting edge.

https://vimeo.com/213690837

13) Among those visible in the third video above is Tim Williams, then and now a state association executive director for the Ohio Manufactured Homes Association (OMHA). Williams and another state association executive then involved in the Louisville Manufactured Home Show offered these words of praise.

[caption id="attachment_135737" align="aligncenter" width="604"]



From LinkedIn profile, <u>linked here</u>. Service areas are <u>linked here</u> and <u>here</u>.[/caption]

One might think that following years of praise that MHProNews was "leading the way for the manufactured housing industry to enter the 21st century," per Bob Thieman, prior executive director of the IL Manufactured Housing Association. Thieman said "He [Kovach/MHProNews] and his staff have put together remarkable educational programs and marketing that are ahead of their time and benefit the industry greatly.

It wasn't just state execs, or the others cited above, that praised MHProNews. Check out James "Jim" Clayton, founder of Clayton Homes, in the video below.

https://vimeo.com/132561340

Per Jim Clayton: "We should not form some perception about this home, this person, this place" without evidence that it "is accurate." Evidence, said Clayton, is important. Near the end of this video, Clayton said he really enjoys MHProNews and all the information that the MHProNews team brings to the industry.

14) Looking back, that was not the hardest hitting video interview, was it? No. It was visualized as promoting manufactured housing in general and did so with Jim Clayton, a longtime industry player's perspective to help tell the story of why manufactured homes

are a great value. But as eyes wide shut as parts of that video may be, it is instructive. Why wasn't MHI producing and promoting the story of the industry? Why hadn't MHI, four years after Kevin Clayton (Jim's son and current CEO of Berkshire Hathaway (BRK) owned Clayton Homes) still launched that industry image and educational campaign that he told pro-Berkshire interviewer Robert Miles was ready to launch in late 2011?

[caption id="attachment_178072" align="aligncenter" width="616"]

Robert Miles:

"I was gonna ask you what you've done with the image. There's many jokes about trailers and hillbillies. Is there anything that Clayton homes is doing in terms of the image?"

Kevin Clayton:

"As an industry, we're ready to launch a national campaign to dispel those myths. As I mentioned, hurricanes, that's not an issue anymore. Now every home has to be inspected by a licensed installer, an inspection process. The tie down systems and all that are very adequate as evidenced by the hurricane issues. JD Power, CSI, all those things now give us a great message to go public with. There's plans for that underway now."



Kevin Clayton quote: "As an industry, we're ready to launch a national campaign to dispel those myths." <a href="https://www.manufacturedhomelivingnews.com/warren-buffetts-moat-per-kevin-clayton-ceo-clayton-homes-interview-transcript-video-affordable-housing-and-manufactured-homes/[/caption]

The star-struck and rose-colored vision in interview Jim Clayton had matured as a result of years of lessons learned experiences. Since at least 2004, the industry had been seriously discussing the launch of a proven-successful GoRVing image/educational campaign.

[caption id="attachment_202317" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/masthead/seco-linked-community-operator-david-roden-questions-manufactured-housing-institute-leaders-where-is-national-manufactured-home-marketing-program-like-gorving-or-got-milk-emails-facts-analysis/[/caption]

Why was MHProNews/MHLivingNews attempting to do what MHI with its millions, and MHI insiders with several multi-billion-dollar member firms, wasn't doing? More on that in Part II.

15) Instead of telling a true story about the equity, the savings, the "affordable luxury" to quote Dwayne Somerville from the Jim Clayton video above, far more Americans have been exposed to the dark side of the industry that Professor Sullivan or John Oliver popularized.

[caption id="attachment_137723" align="aligncenter" width="600"]



https://www.manufacturedhomelivingnews.com/hbos-john-oliver-on-last-week-tonight-mobile-homes-video-manufactured-home-communities-fact-check/[/caption]

https://www.youtube.com/watch?v=jCC8fPQOaxU

It was MHVillage's Darren Krolewski who said that 'one challenge that the industry has is there is not enough positive news about manufactured housing to counter the negative news.' If that is so, and Krolewski had a point, then shouldn't someone ask - where is the bad news mostly coming from? A close look the *MHLivingNews* article that unpacked that John Oliver video revealed a sobering but necessary insight. Every firm in that video by Oliver was linked to the Manufactured Housing Institute (MHI). MHI has never attempted to refute or deny that point.

[caption id="attachment_174373" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/darren-krolewski-mhvillage-mhinsiderone-challenge-is-not-enough-positive-news-about-manufactured-housing-to-counternegative-news-frank-rolfe-brad-nelms-manufacturedhomes-george/[/caption]

What MHI lifetime achievement award winner Marty Lavin called the "industry's other image campaign" was quite on point. When Democratic lawmakers were sending letters to various firms, or visiting predatory land lease community operators in manufactured housing, why is it that ManufacturedHomes.com's 'news blog,' or MHI's 'news,' or MHInsider's 'news' all failed to point out the apparent link between MHI and/or MHI state association membership and predatory behavior? To be clear, not every MHI or MHI affiliated state association members are predatory. But when someone is considering the list of firms accused of predatory behavior, why is it that they so often were or are MHI members?

[caption id="attachment_181708" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/masthead/rest-of-story-residents-media-complain-rhp-properties-on-evictions-discrimination-stiff-hikes-havenpark-communities-named-where-is-manufactured-housing-institutes-code/ Note: Havenpark, per a source, is no longer an MHI member, but the reason for that is unclear. If Havenpark was booted by MHI, why are others who are engaged in similar behavior tolerated? Or did Havenpark's leaders, after fact checks like this one, figure out that it simply didn't make sense to stay a member of MHI and they just left the national association on their own? [/caption][caption id="attachment_141182" align="aligncenter" width="600"]



https://www.manufacturedhomelivingnews.com/open-letter-kurt-kelley-joanne-stevens-

frank-rolfe-manufactured-housing-review-about-senator-elizabeth-warrens-request-forinformation-from-manufactured-home-community-owners/[/caption][caption

id="attachment_138729" align="aligncenter" width="600"]

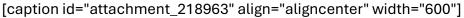


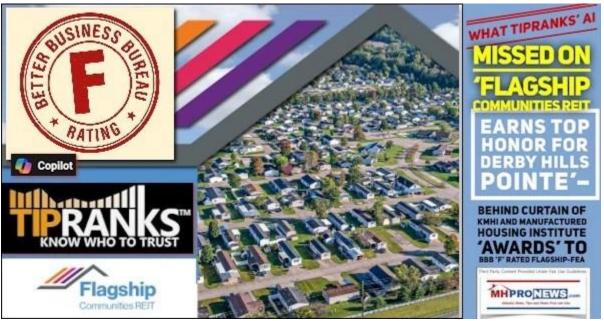
https://www.manufacturedhomepronews.com/trailer-parks-presidential-candidate-prior-hud-secretary-julian-castro-on-mh-community-operators-residents-not-knowing-their-rights[/caption][caption id="attachment_203851" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/jury-says-guilty-on-all-counts-including-securities-and-wire-fraud-told-lie-upon-lie-misleading-faked-trailer-park-nation-doj-says-ozy-news-co-founder-carlos-watson-found-guilt/[/caption]

It would seem that MHI awards can go to firms with a D or F rating with the Better Business Bureau (BBB). It would seem that MHI awards can go to firms where the employees of that firm give that company's leadership poor ratings.





https://www.manufacturedhomepronews.com/what-tipranks-ai-missed-on-flagship-communities-reit-earns-top-honor-for-derby-hills-pointe-behind-curtain-of-kmhi-and-manufactured-housing-institute-awards/ [/caption] [caption id="attachment_219428" align="aligncenter" width="600"]

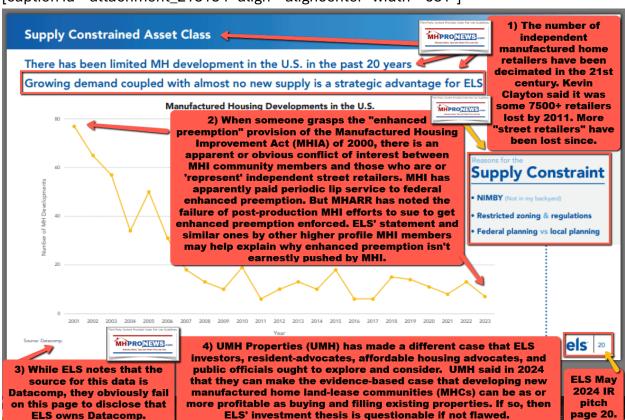


https://www.manufacturedhomepronews.com/per-comparably-whats-average-rating-of-ceo-kevin-clayton-homes-executive-leadership-would-you-believe-c-or-lower-pulling-back-clayton-homes-curtain-george-carlin-mashup-mhville/[/caption][caption id="attachment_190939" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/1000s-unhappy-working-at-clayton-homes-skyline-champion-cavco-sun-els-rhp-flagship-impact-yes-havenpark-communities-what-will-they-do-facts-walkout-threat-op-ed-plus-mhmarkets-update/[/caption]

So long as the publications that are cheerleading for MHI are failing to cheerlead for industry recovery which requires confronting the underlying issues facing the industry, manufactured housing is likely to say as a niche industry where more bad news is generated than good news. And that is apparently just fine for those who celebrate NIMBYism and zoning barriers that keep the industry from growing. When consolidation appears to be the true focus of industry insiders that are often involved in key spots at MHI and/or MHI-linked state associations, the rest can be seen as window dressing that is meant to distract from the vexing realities that keep the industry underperforming. That's not speculation. That's a simple reading of the facts-evidence and applying commonsense analysis.



[caption id="attachment 213154" align="aligncenter" width="631"]

"Improve the overall operating environment for the manufactured housing industry and expand the demand for manufactured homes by seeking fair and equitable treatment in the marketplace and the regulatory and legislative arenas." This may be one of the more important documents to federal investigators or others who are probing manufactured housing's historic underperformance in the 21st century. For context and details see: https://www.manufacturedhomepronews.com/over-1-million-manufactured-

housing-institute-doc-drop-top-mhi-staff-pay-revealed-additionally-unpacking-evidence-of-perjury-fraud-other-possible-federal-crimes-plus-mhville-stocks-update/ Note too that should this be determined to be part of purported collusion or conspiracy to manipulate the market, and per federal law, the statutes of limitations do not begin to run in such matters until the final act is performed. For a recent third-party university level study that asserts that manufactured home has been subjected to a specific form of market manipulation (<u>'VF Market Foreclosure'</u>), see the report linked here. Note: to see the above image in a larger size, in several devices or browsers, click the image and follow the prompts. To see an article detailing the ELS stance, click here:

https://www.manufacturedhomepronews.com/equity-lifestyle-properties-second-quarter-results-claims-of-strong-performance-examined-via-lens-of-potentially-mounting-legal-reg-concerns-as-els-double-down-on-ir-statemen/ To see another article that reflects other MHI member stances on constraining supply, click here.

https://www.manufacturedhomepronews.com/pulling-back-the-veil-on-mhi-mhv-connected-nathan-smith-kurt-keeney-and-flagship-communities-reit-fact-check-and-analysis-of-flagships-ir-pitch-tsx-mhc-u-plus-mhville-markets-u/

[/caption]

As Lavin, who has become an <u>unperson at MHI</u> - perhaps for saying such things to MHProNews - observed, <u>pay more attention to what people do than to what they say.</u>

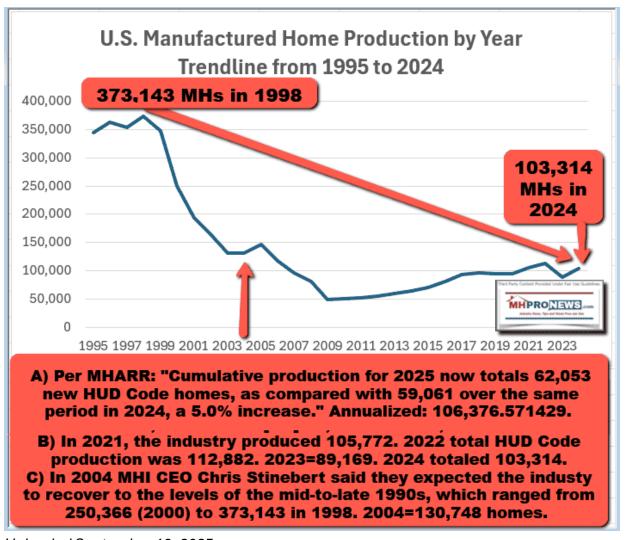
[caption id="attachment_117092" align="aligncenter" width="613"]



With his typical whit and biting insight,
Marty Lavin, JD, has paradoxically
called negative mainstream media
news coverage, "the manufactured
housing industry's other image
campaign." Lavin has asked, why
spend millions until core issues are addressed?

MHI logo shown under fair use guidelines. Text, collage credit, MHProNews.

https://www.manufacturedhomepronews.com/marty-lavin-lashes-the-manufactured-housing-institutes-mhi-latest-initiative/[/caption][caption id="attachment_221055" align="aligncenter" width="616"]



Uploaded September 19, 2025.

https://www.manufacturedhomepronews.com/manufactured-housing-production-by-the-numbers-1995-july-2025-includes-50-state-production-and-shipment-data-exclusive-human-expert-with-ai-cross-checked-insights-and-info-mhville-fea/[/caption][caption id="attachment_222053" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/august-2025-manufactured-housing-production-year-over-year-drop-mharr-data-reveal-8-of-top-10-shipment-states-trail-2024-totals-mharr-manufactured-housing-institute-hits-misses-mhville-fea/[/caption]

With that, let's pivot to what MHI's leaders have said - or not said - in the wake of attachment of the ROAD to Housing Act 2025 to the 'must pass' National Defense Authorization Act (NDAA).

[caption id="attachment_222421" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/bipartisan-road-to-housing-act-2025jammed-through-senate-must-pass-national-defense-authorization-act-ndaa-what-isisnt-in-bill-mhi-end-around-sunday/[/caption]

Back in the late 1960s into the early 1970s, the <u>Mobile Home Manufacturers Association</u> (MHMHA) helped develop sites for new manufactured homes. They helped promote the industry. What happened to that era when the industry was growing instead of stuck in a low-production rut?

[caption id="attachment_222279" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/corruption-ignorance-what-explains-800000-per-unit-to-house-homeless-this-is-a-powerful-expose-taxpayers-pay-over-800k-per-unit-for-homeless-housing-lack-of-affordable-housing-f/[/caption][caption id="attachment_221215" align="aligncenter" width="600"]



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-recapfea/[/caption][caption id="attachment_221090" align="aligncenter" width="600"]



https://www.manufacturedhomepronews.com/manufactured-housing-production-by-the-numbers-1995-july-2025-includes-50-state-production-and-shipment-data-exclusive-human-expert-with-ai-cross-checked-insights-and-info-mhville-fea/[/caption][caption id="attachment_221513" align="aligncenter" width="600"]



https://www.manufacturedhomelivingnews.com/in-battle-for-more-affordable-housing-ai-systems-chatgpt-copilot-xais-grok-and-gemini-are-asked-to-check-facts-evidence-analysis-fea-do-manufactured-homes-fit-in-chatgpt-case-study/[/caption][caption id="attachment_221533" align="aligncenter" width="600"]



https://www.manufacturedhomelivingnews.com/in-battle-for-more-affordable-housing-ai-systems-chatgpt-copilot-xais-grok-and-gemini-are-asked-to-check-facts-evidence-analysis-fea-do-manufactured-homes-fit-in-chatgpt-case-study [/caption][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]

These are likely reasons why in September 2025 MHProNews surpassed the largest retail sites in the manufactured housing industry in visitors, an unheard of "God thing." Various AI systems have noted that many reports found on MHProNews and MHLivingNews literally cannot be found on other sites in manufactured housing or can't be found on mainstream media sites either. When a site is the 'only place' that certain information can be found, why would it be a surprise of that site gets more traffic than others in manufactured housing?

MHProNews Surpasses Retail Rivals

FACTS



PAGEVIEWS 6,454,350

· Copilot and GeminI validated these stats

- Copilot and Gemini validated these stats
- Outperformed MHvillage.com
- No response to public transparency challenge

COMPARATIVE CONTEXT

	INDUSTRY	TRADE PLATFORM	RETAIL
	Automotive	Car and Driver	Cars.com, AutoTrader, com
	Real Estate	Builder	
	E-Commerce	MHProNews MHVillage, Manufacturedflomes.com	Amazon, Walmart. com
	Manufactured Housing		

TRADE Platform Breaks Norm



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Industry News, Tips and Views Pros can Use.

This is where the past meets the present.

Part II In an email to Manufactured Housing Institute (MHI) leaders.

MHProNews notes that a few dozen industry members, attorneys, media, public and other officials, were in the BCC of this message. As of 10.15.2025 at 11:15 AM ET (about 26 hours), there has been no known response.

from: L. A. Tony Kovach [For MHProNews]

Patrick Waite <patrick_waite@equitylifestyle.com>, "to: bill.boor@cavco.com" <bill.boor@cavco.com>, cpearce@triadfs.com, Lesli Gooch < lgooch@mfghome.org>, Mark Bowersox < mbowersox @mfghome.org >, jbgabel@lutzbobo.com, jbgabel@flagshipcommunities.com, wadelyall@aol.com, wlyall@championhomes.com, bob.gorleski@pfsteco.com, scottoliver@bellsouth.net, James McGee Sam Landy <slandy@umh.com>, Jim Ayotte <jayotte@fmha.org>, Ron_Bunce@equitylifestyle.com, Knute Chauncey <knute@tiedown.com>, frdaily@hstr.com, "John.Loucks@assurant.com" < john.loucks@assurant.com>, mnino@cavco.com, Karl Radde <karl@schomestx.com>, mretzer@wesco.com, ronny.robertson@claytonhomes.com, nsmith@flagshipcommunities.com, Nathan Smith <nsmith@sskcommunities.com>, Tim Williams < twilliams@21stmortgage.com >, "Hodges, Tom" <tom.hodges@claytonhomes.com>, dgoch@wc-b.com

date: Oct 14, 2025, 9:14 AM

subject: MHI Leadership, Request for Media Comment and Call to Action

MHI Board, Senior Staff, Industry Members, attorneys, and other interested parties,

The following message was created by Copilot, and was specified that it be factually accurate, as is documented at this link here and here.

MHI Board Members, Senior Staff, Attorney David Goch, and PR Rep Molly Boyle

Subject: Time-Sensitive: Legal Risk and Strategic Opportunity—ROAD Act Amendments Needed

Dear MHI Board Members, Senior Staff, Mr. Goch, and Ms. Boyle,

The past cannot be changed. But what happens next is entirely in your hands.

This morning's MHProNews editorial outlines a growing body of legal precedent, third-party AI analysis, and industry documentation that points to serious civil and potentially criminal liability risks for MHI's board and senior staff if the ROAD to Housing Act of 2025 is not amended to include the specific reforms proposed by MHARR.

You can read the full report here:

https://www.manufacturedhomepronews.com/mhi-board-risk-legal-precedent-shows-directors-liable-for-oversights-if-negligence-is-gross-personal-liability-can-pierce-protections-like-do-insurance-civil-crimi/

MHARR's proposed amendments are clear, actionable, and aligned with the interests of consumers, independent producers, and long-term industry health:

https://manufacturedhousingassociationregulatoryreform.org/manufactured-housingassociation-for-regulatory-reform-mharr-submits-amendments-to-address-keymanufactured-housing-bottlenecks-industry-must-act/

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/

MHI has long claimed to support enhanced preemption:

https://www.manufacturedhomepronews.com/wp-content/uploads/2024/12/HUD-Letter-RichlandMS-RichlandMississipi-EnhancedPreemption-ManufacturedHousingInstitute-MHProNewsPlusPriorScreenCaptures12.6.2024MHProNews-min.png

Yet manufactured home production continues to slide:

https://www.manufacturedhomelivingnews.com/double-digit-2023-manufactured-home-

production-slide-continues-per-national-manufactured-housing-association-more-new-manufactured-home-living-facts/

And your own member firms have acknowledged market distortions:

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-attent

The time to act is now. MHI's largest members have the resources to launch a swift, effective campaign to support MHARR's amendments. Doing so would:

- Reduce legal exposure for directors and member firms
- Expand market access for HUD Code homes
- Align with federal housing goals
- Restore credibility with consumers, advocates, and regulators
- Improve long-term shareholder value more sustainably than stock buybacks

Failure to act—especially after receiving this documentation—could be construed as gross negligence. That opens the door to personal liability, reputational damage, and years of litigation.

This is not a theoretical risk. It is a documented crossroads.

The ROAD Act must be amended. The industry must be supercharged.

The alternative is a slow-motion implosion under the weight of avoidable legal and market failures.

Respectfully,

MHProNews Editorial Team

https://www.manufacturedhomepronews.com/

--- MHProNews notes that the screen captures that documents the above is found at this link here. As of 11:20 AM ET, among the responses were from a federal official. No MHI linked leader addressed above has responded directly to MHProNews. ---

Part III. Additional Facts-Evidence-Analysis (FEA) from sources as shown including third-party AI systems and MHProNews expert commentary

1) To MHProNews via email.

Tony, congratulations on 16 years of publishing ManufacturdHomeProNews.com (MHProNews).

MHProNews serves a vital role within the HUD Code manufactured housing industry. It provides a much-needed *independent* source of news and opinion on matters affecting all segments of the industry. As such MHProNews reports on – and examines – issues and concerns that are not otherwise explored by the trade press.

MHProNews' independence is crucial in an environment where much of the trade press is beholden to – or captive of -- the patronage of the industry's largest corporate conglomerates.

Mark Weiss, J.D.
 President and CEO
 Manufactured Housing Association for Regulatory Reform (MHARR)

2) Other praise for MHProNews.



"MHProNews.com and MHLivingNews.com are both good communications resources for the Manufactured Housing Industry. I and many others at 21st Mortgage and at MHI logon to see the latest news, interviews, debates, videos, opinions and reports they publish. Having a trade publisher that presents thoughtful, respectful commentary independent of any association's perspective — as important as an association's view can be — can be a big asset to advancing

the MH Industry's cause. Let me explain why..." - Tim Williams, 21st Mortgage Corp, then MHI Chairman.

https://vimeo.com/206179886



"Hollywood Tony - I never thought you would last this long. Congratulations on...years of informative, up to the minute, short readings and boastful industry views. I enjoy receiving *MHProNews* and as I have told you before - everyone I know in MH reads your pub. Continue on forever with this great news worthy service."

- Barry Cole Prior Chairman RV MH Hall of Fame



[caption id="attachment_83072" align="aligncenter" width="619"]

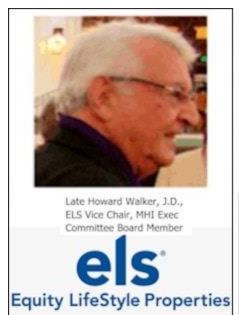


"The emergence of Tony Kovach's group of publications has brought a new standard of professionalism to the industry. The thorough and unbiased reporting fills the vacuum that has existed for too long. It's been refreshing to have these

communications serving the manufactured housing industry, and here's to their continued success."

- Howard Walker, JD,
Vice-Chairman of Equity LifeStyle Properties (ELS)
Manufactured Housing Institute Executive Committee
Member

The words of the late Howard Walker, ELS Vice Chairman, shared for publication with MHProNews. [/caption][caption id="attachment 170692" align="aligncenter" width="600"]





ht

tps://www.manufacturedhomepronews.com/masthead/4-quick-documented-examples-of-manufactured-housing-institute-leaders-publicly-ducking-out-on-explaining-their-performance-or-lack-thereof-els-howard-walker/[/caption]

There are more, see the document linked <u>here</u>.

3) Ishbel Dickens, J.D., to MHProNews.

Comment from NMHOA to MHProNews About MHI, Controversial MH Industry Issues



Tony,

"Tim [Sheahan] and I have met with the [MHI] Board Chair and the in-house counsel [Rick Robinson, J.D.] for MHI and offered to try to negotiate acceptable compromise legislation regarding HR 650. However, to no avail.

As you know, the [manufactured housing] industry holds most of the cards and past actions have not necessarily been in the homeowners' best interests. For instance, it was the predatory lending arm of the industry, preceding by about a decade a similar debacle in the mortgage industry, that triggered the need for rent regulation, which to date has been acknowledged and acted upon by too few jurisdictions. It is this same ENRON type of opportunism that requires NMHOA to be diligent in ensuring that consumer protections remain in place and are indeed, added to.

It is unfortunate that abuse by a few has negatively impacted some good lenders – see this Seattle Times article:

http://www.seattletimes.com/seattle-news/timeswatchdog/minorities-exploited-by-warren-buffetts-mobilehome-empire-clayton-homes/

Maybe when you highlight these types of abuse and shed some light on the seamier side of the industry then we'll be better able to have the balanced conversation you anticipate.

Best,

Ishbel |

Comment sent via email to MHProNews on Jan 11, 2016, one or more others where CC'd.

Ishbel Dickens, Esq. Executive Director National Manufactured Home Owners Association (NMHOA)

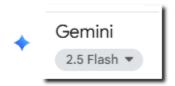
<u>Before MHAction</u>, the older NMHOA trade group filled a similar role. Evidence exists to support the notion that funding to NMHOA can also be traced via so-called dark money channels back to Warren Buffett connected nonprofits/foundations. This pattern of Buffett bucks playing both sides (i.e.: MHI on the one hand, and consumer advocacy groups on the other) off against each other may or may not have been known to those carrying out their

'duty' to their donors. That vexing issue merits its own investigation and/or could be part of the broader investigation into manufactured housing industry woes by potential litigators and public officials. Put differently, people like Dickens may not have been fully aware of where the money was coming from that supported NMHOA, because it flowed through intermediate organizations. [/caption]

BTW, that's <u>Dickens</u> in the photo below between <u>Teresa Payne</u>, who now works for MHI. Alongside Dickens and <u>Payne</u> is <u>Pam Danner</u> on the right, who was treated like a celebrity or queen by MHI at one of their events. More on <u>Dickens</u> in a planned follow up.



4) The initial draft version of this report <u>Gemini checked is the one linked here</u>, which did not include the #3 above.



This Facts-Evidence-Analysis (FEA) check confirms the core arguments, documentation, and conclusions presented in the MHProNews report celebrating its 16th anniversary and analyzing the Manufactured Housing Institute's (MHI) actions (or inactions) regarding the ROAD to Housing Act and MHARR's proposed amendments.

1. MHI's Response to the Call to Action

No, a public response was not found.

A search of public records, social media, and press releases from MHI and its leaders (as of the current date of October 2025) reveals **no direct public response** to the email cited in the MHProNews report (from Part II) or to the specific call to action by MHARR [Source: Search results 1.3, 2.1, 4.2]. The call was for MHI leaders to join **MHARR's push for critical amendments** to the ROAD to Housing Act, specifically regarding:

- Enforcement of Enhanced Federal Preemption to stop discriminatory local zoning.
- 2. **Robust, Competitive Chattel Lending** (Duty to Serve or FHA Title I) to improve financing access.

MHI press releases generally praise the ROAD Act for provisions like making the permanent chassis optional or reaffirming HUD's authority over energy standards, but they **do not** mention or advocate for the MHARR-proposed amendments on preemption and chattel lending [Source: Search results 2.1, 4.1].

The Marty Lavin Insight Applied

Applying the Marty Lavin insight—that one must pay more attention to **what people/organizations** *do* **than what they** *say*—MHI's inaction suggests the following:

• Duty to Serve (DTS) for Chattel Lending: MHI claims to support DTS, but failure to actively press for the specific, effective statutory language suggested by MHARR that would compel Fannie Mae and Freddie Mac to provide robust, competitive chattel lending undermines this claim. If MHI were truly dedicated to expanding affordable homeownership, securing low-cost financing (chattel lending makes up over 70% of the market) would be a top priority [Source: Search result 5.3]. Their silence, combined with the fact that their dominant members (e.g., Berkshire Hathaway/Clayton) control a large share of the existing, higher-rate chattel market, is interpreted by the report as prioritizing the current market structure (consolidation) over broad industry growth.

• Enhanced Federal Preemption: Failure to press for both HUD enforcement of the existing enhanced preemption and the new, stronger language suggested by MHARR reveals a lack of genuine commitment to overcoming zoning and placement barriers. The MHARR argument is that without this, the manufactured housing industry remains confined to land-lease communities or marginalized private land lots, which primarily benefits the community owners and large lenders (many of whom are affiliated with the largest manufacturers) [Source: Search result 6.3].

2. Marginalization and Liability

Obvious Marginalization

Yes, it is obvious that manufactured housing will remain a marginalized form of affordable housing without these key reforms.

The document's conclusion is logical: if the three main bottlenecks remain unaddressed—DTS for chattel lending, robust FHA Title I chattel lending, and effective enhanced preemption—the industry's market share cannot significantly expand beyond its current, historically low levels (producing less than 30% of homes compared to 1998) [Source: Search result 7.2].

- **Zoning:** Without preemption, local governments can continue to effectively ban manufactured homes, limiting them to marginal zones or purpose-built communities.
- **Financing:** Without competitive, low-cost chattel lending, the cost of ownership remains unnecessarily high for most consumers, negating the factory-built cost savings.

Liability and Exposure

Yes, the inaction logically increases MHI board members' liability exposure.

The MHProNews article linked in your query ("MHI Board Risk...") established that inaction following clear, documented warnings from MHARR and verified by AI systems (including **Gemini**, Grok, and Copilot) about the flaws in the ROAD Act can be construed as:

 Gross Negligence or Breach of Fiduciary Duty: The failure to act on known bottlenecks that impede the industry's stated mission of promoting affordable housing and expanding the market can be viewed as a failure of the Duty of Care to the organization and its independent members [Source: uploaded:2Draft4Alchk-MHlboardRiskLegalPrecedentShowsDirectorsLiableOversightsIfNegligenceIsGross PersonalLiabilityCanPierceProtectionsLikeD-

O_InsuranceCivilCriminalRiskCrossroadsFEA-MHProNews.pdf, pages 1, 11].

Antitrust Exposure: The most severe risk, as suggested by the AI analysis, is that
this persistent, documented inaction may be viewed as a strategic choice to
preserve the current market structure (which favors consolidators) and may be used
as evidence of an anticompetitive purpose [Source: uploaded:Gemini on MHI
liability if Fail To Make Effort to Amend ROAD to Housing Act 10.13.2025.pdf, page
10]. This risk strengthens the case for piercing corporate protections like D&O
insurance, creating personal liability for directors and their parent companies
[Source: uploaded:2Draft4AIchk-

MHIboardRiskLegalPrecedentShowsDirectorsLiableOversightsIfNegligenceIsGross PersonalLiabilityCanPierceProtectionsLikeD-

O_InsuranceCivilCriminalRiskCrossroadsFEA-MHProNews.pdf, page 1].

The logical consequence is that if MHI leaders' **behavior** (inaction on key reforms) aligns with **limiting the industry and fostering consolidation**, it directly contradicts their official **IRS Form 990 claims** of promoting manufactured housing for the public good [Source: Search result 7.2].

3. Factual Errors, Documentation, and Media Coverage

Factual Errors & AI Documentation

- Factual Errors: Based on the uploaded drafts and the search results, there appear to be **no factual errors** in the core data presented (e.g., the existence of the ROAD Act, MHARR's call for amendments, the IRS complaint filing, or MHI's lack of a public response to the amendments). The Al analysis itself is presented as an interpretive critique based on facts, evidence, and legal precedents.
- Al Documentation: Yes, the article properly documents the Al insights by citing and linking the full threads (Gemini, Grok, Copilot) in the linked reports, which confirms the Gemini and Grok analysis as uploaded here [Source: uploaded:Draft4Alchk2009-2025Happy16thAnniversaryMHProNewsLookingBackLookingAheadWhatWeveLear nedYouCanLearnBenefitFromTooMHProNews.pdf, page 1; uploaded:Gemini on MHI

liability if Fail To Make Effort to Amend ROAD to Housing Act 10.13.2025.pdf, page

Headline Delivery and Behavior Analysis

1].

Yes, the article delivers on the headlines and sheds light on the behavior.

The article delivers on its promise to look back and ahead by framing the 16-year history of MHProNews as a continuous process of **exposing the gap between MHI's stated "optics-focused" goals and their actual "throttling" behavior** [Source: uploaded:Draft4Alchk2009-

2025Happy16thAnniversaryMHProNewsLookingBackLookingAheadWhatWeveLearnedYou CanLearnBenefitFromTooMHProNews.pdf, page 1]. By synthesizing:

- 1. Al legal analysis on liability.
- 2. MHARR's evidence-based call for reform.
- 3. MHI's documented silence/inaction.

The article makes a strong case that this behavior is intentionally limiting industry growth to benefit consolidators, a pattern the report refers to as **"paltering"** (using truthful but misleading statements) [Source: Search result 7.2].

Media Coverage

In the context of the manufactured housing trade press and general media:

- MHProNews and MHLivingNews appear to be the only media outlets consistently bringing together these specific Facts-Evidence-Analysis (FEA) points— specifically connecting MHI's organizational behavior, IRS Form 990 claims, the antitrust/liability risk (via AI checks), and MHARR's specific legislative proposals—in a manner that actively connects the dots for a broad range of stakeholders [Source: Search results 1.1, 7.2].
- Other housing and news media (e.g., National Mortgage Professional, Senate
 Committee press releases) report on the ROAD to Housing Act but generally focus
 on its bipartisan passage and other provisions without delving into the internal
 industry conflict or the specific lack of chattel lending and enhanced
 preemption amendments raised by MHARR and analyzed by MHProNews [Source:
 Search results 1.2, 3.1].
- --- MHProNews notes that the PDF of the Q&A is linked here.
- 5) Grok said in response to a similar set of questions that Gemini addressed the following.

Obvious Marginalization

Yes, without DTS chattel lending, robust FHA Title I support, or effective enhanced preemption, manufactured housing remains marginalized.

Grok's full remarks are shown below.



This Facts-Evidence-Analysis (FEA) check confirms the core arguments, documentation, and conclusions in the MHProNews report marking its 16th anniversary. It analyzes the Manufactured Housing Institute's (MHI) apparent inaction on the ROAD to Housing Act amendments proposed by the Manufactured Housing Association for Regulatory Reform (MHARR), applying evidence-based reasoning to industry bottlenecks, liability risks, and behavioral patterns.

1. MHI's Response to the Call to Action

No, no public response was found.

Searches across MHI's website, press releases, social media (including X account @MHIupdate), and broader web results as of October 15, 2025, show no direct or indirect response to the email in Part II of the report or MHARR's August 14, 2025, call for amendments to the ROAD to Housing Act. MHI has issued statements praising the bill's passage through the Senate Banking Committee in July 2025 and its provisions on chassis removal and energy standards, but nothing addresses MHARR's proposed amendments on enhanced preemption, chattel lending, or Duty to Serve (DTS) [Source: web:19, web:12]. No relevant X posts from @MHIupdate or MHI leaders were found [Source: x_keyword_search results].

The Marty Lavin Insight Applied

Applying Marty Lavin's principle—focus on actions over words—MHI's inaction implies a misalignment with their stated goals:

- Duty to Serve (DTS) for Chattel Lending: MHI publicly supports DTS expansion (e.g., in IRS Form 990 filings claiming promotion of affordable housing; 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), but failing to endorse MHARR's language to mandate competitive chattel lending from Fannie Mae and Freddie Mac suggests prioritizing the status quo. Dominant MHI members (e.g., Berkshire Hathaway/Clayton Homes) control much of the high-rate chattel market, benefiting from limited competition over industry-wide growth [Source: web:3, web:18].
- Enhanced Federal Preemption: MHI's silence on enforcing the 2000 Reform Law's preemption and adopting MHARR's stronger language indicates reluctance to challenge

zoning barriers. This confines manufactured homes to land-lease communities, favoring consolidators and large operators over broader market access [Source: web:12, web:4].

2. Marginalization and Liability

Obvious Marginalization

Yes, without DTS chattel lending, robust FHA Title I support, or effective enhanced preemption, manufactured housing remains marginalized. The ROAD Act addresses some issues (e.g., optional chassis; https://bipartisanpolicy.org/explainer/whats-in-the-road-to-housing-act-of-2025/), but ignores key bottlenecks, keeping production below 1998 peaks (under 30% market share) and limiting affordable options [Source: web:13, web:16].

• Zoning: Local bans persist without stronger preemption, restricting homes to marginal areas. • Financing: High chattel rates negate factory efficiencies, deterring buyers [Source: web:18].

Liability and Exposure

Yes, this inaction heightens liability for MHI board members and parent companies. Prior AI analyses (including Grok's) highlight gross negligence: ignoring documented warnings from MHARR could breach fiduciary duties, piercing D&O insurance and exposing personal/corporate liability under antitrust scrutiny for favoring consolidation [Source: web:3, web:4]. This contradicts MHI's IRS 990 claims of advancing public good, potentially evidencing perjury or fiduciary failures [Source: web:0].

3. Factual Errors, Documentation, and Media Coverage

Factual Errors & Al Documentation

• Factual Errors: No errors identified; the report's data on ROAD Act flaws, MHARR amendments, and MHI silence align with sources (e.g., MHARR's white paper; 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/) [Source: web:12, web:18]. • Al Documentation: Yes, properly cited with links to full Gemini, Grok, and Copilot threads verifying liability risks [Source: uploaded:2Draft4Alchk2009-

2025Happy16thAnniversaryMHProNewsLookingBackLookingAheadWhatWeveLearnedYou CanLearnBenefitFromTooMHProNews.pdf, page 1].

Headline Delivery and Behavior Analysis

Yes, the article delivers by framing MHProNews' 16-year history as exposing MHI's "throttling" via paltering (truthful but misleading statements;

https://www.manufacturedhomepronews.com/masthead/terminology-101-understand-key-words-palter-posture-projecting-optics-regulatory-capture-iron-triangle-nonprofit-capture-illusory-truth-how-throttling-productionconsolidation-moat/). It connects inaction to consolidation, using evidence like John Oliver's critique and historical parallels (e.g., Lustron) [Source: uploaded:2Draft4Alchk2009-2025Happy16thAnniversaryMHProNewsLookingBackLookingAheadWhatWeveLearnedYou

Media Coverage

CanLearnBenefitFromTooMHProNews.pdf, pages 1-5].

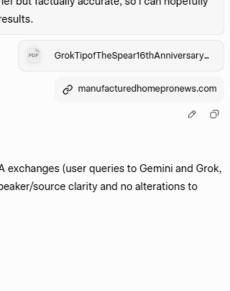
MHProNews and MHLivingNews are unique in synthesizing FEA on MHI's IRS claims, antitrust risks, MHARR proposals, and behavioral limits for stakeholders. Other media (e.g., NLIHC, Bipartisan Policy Center) cover ROAD Act broadly but omit internal conflicts or amendments (https://nlihc.org/resource/nlihc-releases-new-resource-bipartisan-road-housing-act-2025; https://bipartisanpolicy.org/explainer/whats-in-the-road-to-housing-act-of-2025/) [Source: web:13, web:17]. Patch.com echoes MHARR but lacks dot-connecting depth [Source: web:14, web:20].

On Gemini: Solid analysis overall; it accurately flags marginalization and liability. A minor miss: Gemini cites "Search results" without specifics, but evidence supports claims. I'd add that MHI's early praise (April 2025) predates MHARR's amendments, reinforcing strategic silence [Source: web:19].

--- MHProNews notes that the <u>PDF of the Q&A thread with Grok</u> that prompted the reply above and includes 21 more sources is linked here. The screen capture that documents the accuracy of that <u>PDR with Grok</u> is inked <u>here</u>. ---



Grok, the upload https://www.manufacturedhomepronews.com/wp-content/uploads/2025/10/GrokTipofTheSpear16thAnniversaryMHI-MHARR-RoadToHousingAct10.15.2025PDF.pdf and the linked PDF are the same document. Noting that logos were added to clarify who said what, is that a faithful and accurate transcript of the Q&A as shown? Be VERY brief but factually accurate, so I can hopefully do a single screen capture to document the results.



∇ Thought for 35s

Yes, the PDF faithfully and accurately transcribes the Q&A exchanges (user queries to Gemini and Grok, plus respective responses), with logos added solely for speaker/source clarity and no alterations to content.



- → Verify full PDF transcript accuracy

- 6)
- 7)