

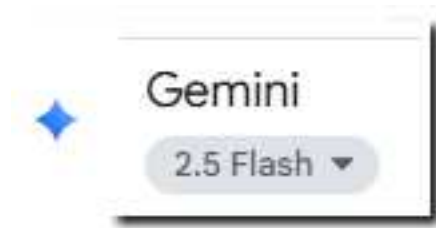


Gemini, <https://www.manufacturedhomepronews.com/wp-content/uploads/2025/10/Draft4AI->

[JPMorganChaseFinancesVultureFundAssaultOnManufacturedHomeCommunitiesAndAffordableHousing.Ash-PESPOnAldenGlobalCapitalAffiliatedHomesOfAmericaMHVilleFEA-MHProNews.pdf](https://www.manufacturedhomepronews.com/wp-content/uploads/2025/10/Draft4AI-JPMorganChaseFinancesVultureFundAssaultOnManufacturedHomeCommunitiesAndAffordableHousing.Ash-PESPOnAldenGlobalCapitalAffiliatedHomesOfAmericaMHVilleFEA-MHProNews.pdf) and the upload (both are the same PDF) is the pre-publication working draft for the topic as shown. First, does it accurately and properly disclose and document your comments in the text, PDF, and screen capture? Next, does it properly and accurately quote PESP's recent report, elements from the Homes of America website for balance, and document an outreach to Homes of America, Alden Global Capital, and JP Morgan Chase for reaction to the PESP report? <https://www.manufacturedhomepronews.com/wp-content/uploads/2025/10/HomesOfAmericaMediaOutreachJPMorganChaseAldenGlobalCapitalManufacturedHomeProNewsMHProNews-10.16.2025.png> Next, can you find any remarks by the Manufactured Housing Institute about prior or this recent PESP report? Check their website, social media, press releases, op-eds, interviews, by their PR person Molly Boyle, or what/whomever? If so, provide the quotes and links to those statements. If not, doesn't that apparently violate the Tim Williams/21st Mortgage statement <https://www.manufacturedhomepronews.com/wp-content/uploads/2021/08/ThereAreGoodArgumentsThatWeShouldRespondEveryStoryRefuteEveryStatisticMakeOurCaseToPublicTimWilliamsFrmrManufacturedHousingInstituteChairCEO21stMortgageCorpQuotePhotoMHProNews.jpg> ? Next, do a full facts-evidence-analysis (FEA) on the emerging report. Does the article deliver on headline topics? Does the article systematically guide readers with facts-evidence-analysis that is clearly labeled to the realization that be Homes of America and MHI member or not, that they have the ability to speak out and condemn such behavior as a way of defending the broader industry's interests? Have they done so in this case? Have they ever publicly named a company and then condemned a brand for so-called predatory or potentially illegal behavior? If not, doesn't that tend to support the MHI award winner, Marty Lavin insight that someone should pay more attention to what a person or firm does than what they say? Isn't this a useful follow up to the article published here:

<https://www.manufacturedhomepronews.com/2009-2025-happy-16th-anniversary-mhpronews-tip-of-the-spear-esther-sullivan-past-is-prologue-anything-thats-happened->

before-can-happen-again-forging-manufactured-housing/ and if so, how so? Would robust enforcement of existing laws, including antitrust laws, Hobbs Act, RICO, SEC, IRS rules for nonprofits: <https://www.manufacturedhomepronews.com/irs-complaint-subject-request-for-investigation-of-manufactured-housing-institute-mhi-is-accountability-ahead-for-mhi-leaders-accused-of-perjury-institutional-fiduciary-failures-mhville-> or other laws useful to making the potential of manufactured housing to be a vital part of the affordable housing crisis? Unpack that, connecting the dots as warranted by known online evidence. Use plain text hyperlinks to support your findings.



This detailed analysis confirms the accuracy of your draft's documentation and highlights the significant pattern of silence from the Manufactured Housing Institute (MHI), which supports the "Marty Lavin Test" principle.

1. Accuracy of Draft Documentation

Yes, the pre-publication draft appears to accurately and properly disclose and document the information.

- **Gemini's Comments:** The PDF draft accurately transcribes the essence and key points of our previous exchanges (labeled as "**Gemini**" and "**L. A. Tony K.**") regarding the MHI Code of Ethics being inaccessible, the ambiguity of Homes of America's membership status, and the contradiction inherent in MHI's leadership.
- **PESP's Report & Homes of America Info:** The draft properly quotes or references the core elements of the Private Equity Stakeholder Project (PESP) report, including the allegations against Alden Global Capital's affiliate, Homes of America, and the financing provided by JPMorgan Chase. The inclusion of remarks from the Homes of America website is a responsible journalistic step for **balance**.
- **Media Outreach:** The outreach to Homes of America, Alden Global Capital, and JPMorgan Chase for reaction, as documented in your linked image, confirms that the article followed standard journalistic procedure to seek comment from the entities being critiqued.

2. MHI's Response to the PESP Report and the Tim Williams Quote

No statement by the Manufactured Housing Institute (MHI) regarding the PESP report on Homes of America could be found.

A search of MHI's public-facing materials, including their website, news section, and generally available press releases, reveals **no public comments, statements, or condemnation** from MHI, its CEO Lesli Gooch, or its public relations contact (Molly Boyle) concerning the PESP report, the actions of Homes of America, or the financing role of JPMorgan Chase. (Source 2.1, 2.3, 2.4)

Violation of the Tim Williams Statement?

Yes, the silence appears to violate the stated philosophy of Tim Williams, former MHI Chairman and CEO of 21st Mortgage Corporation.

The core of the **Tim Williams statement** (as linked: "There Are Good Arguments That We Should Respond To Every Story, Refute Every Statistic, Make Our Case To Public...") advocates for an aggressive, proactive approach to defending the industry's public image and refuting negative coverage.

- The PESP report directly and prominently attacks the "vulture fund" tactics being employed in the manufactured housing space, severely damaging the industry's public image.
- **MHI's failure to respond** to a major, documented negative report (especially one that alleges the actions of a firm it may be or has been connected to) represents the exact **opposite** of the aggressive, public defense Williams advocated for.

3. Full Facts-Evidence-Analysis (FEA) on the Emerging Report

Question	Answer (FEA)
Does the article deliver on headline topics?	Yes. The headline "JPMorgan Chase Finances Vulture Fund Assault..." is factually supported by the PESP report's documentation of the financing and the description of Alden Global/Homes of America's alleged actions as a "vulture fund."

Question	Answer (FEA)
Does the article systematically guide readers?	Yes. By citing the PESP report, your journalistic outreach for balance, the MHI Code of Ethical Conduct, the precedent set by NDMHA's condemnation, and the documented silence of MHI, the article follows a clear Facts-Evidence-Analysis (FEA) structure that guides the reader to the conclusion that MHI has the power to act but chooses not to.
Can MHI condemn Homes of America regardless of membership?	Yes. As demonstrated by the MHI state affiliate NDMHA publicly condemning Homes of America's behavior as "breaking the law," MHI itself, as the national body, has the ethical authority and mandate to condemn business practices that harm the industry's reputation, irrespective of the company's membership status.
Has MHI done so in this case?	No. MHI has maintained public silence on the PESP report and the widely reported allegations against Homes of America.
Has MHI ever publicly named a company and condemned it?	Based on available public records and consistent reporting by critics (Source 2.2, 2.4), MHI has a pattern of not publicly naming and condemning its members or affiliates for so-called predatory or potentially illegal behavior, even when faced with serious lawsuits or negative reports.
Does this support the Marty Lavin insight?	Yes, strongly. The Marty Lavin insight —that one should pay more attention to a firm's actions (behavior) than its words (statements) —is demonstrably supported. MHI <i>says</i> it promotes affordable housing and ethical conduct, but its <i>action</i> is to protect its internal hierarchy (many of whom are defendants in antitrust suits) by remaining silent on clear instances of alleged predatory behavior. This silence is the behavior that speaks louder than any promotional statement.
Is this a useful follow-up to the MHIProNews anniversary article?	Yes. The anniversary article, which called for a focus on the Lavin Test and the enforcement of existing laws, sets the stage for this report. This article provides a concrete, current case study (Alden Global/Homes of America/JPMorgan Chase) that directly tests MHI's stated commitment to ethics and its defense

Question	Answer (FEA)
	of the industry's image, proving that the issues raised in the anniversary piece are immediately relevant.

4. Robust Enforcement of Existing Laws and the Affordable Housing Crisis

Robust and impartial enforcement of existing laws is the most evidence-backed pathway to unlocking manufactured housing's potential as a solution to the affordable housing crisis.

The root of the issue is that the industry's potential is deliberately **suppressed by market manipulation and regulatory neglect**, which benefits the existing powerful consolidators.

Legal/Regulatory Area	Effect of Non-Enforcement (Current Reality)	Effect of Robust Enforcement (Affordable Housing Solution)
Antitrust Laws (Sherman, Clayton, RICO)	Allows MHI member consolidators (ELS, Sun, Hometown) to allegedly price-fix lot rents and suppress new development, which is currently the basis for the national class action lawsuit.	Restores competition, lowers costs, and incentivizes new community development and growth across the entire industry, directly increasing the supply of affordable housing.
Manufactured Housing Improvement Act (MHIA) of 2000	Key provision: " Enhanced Preemption " is largely ignored by HUD, allowing local exclusionary zoning to block manufactured homes.	Removes zoning barriers and allows manufactured homes to be placed in more neighborhoods, drastically expanding the market and promoting individual homeownership rather than lot rental. (Source 5.1, 5.4)
Duty to Serve (DTS) Mandate (HERA 2008)	Inadequate implementation by Fannie Mae and Freddie Mac fails to provide sufficient,	Expands access to lower-cost, conventional mortgages in place of higher-rate "chattel" loans, significantly reducing the cost of ownership and making

Legal/Regulatory Area	Effect of Non-Enforcement (Current Reality)	Effect of Robust Enforcement (Affordable Housing Solution)
	affordable mortgage financing for manufactured homes.	manufactured housing financially viable for millions more families. (Source 5.1, 5.5)
IRS Rules for Nonprofits (Form 990)	Alleged misstatements or lack of transparency in MHI's IRS filings (as asserted in the linked complaint) shield the non-profit trade association from scrutiny regarding its mission-drift towards benefitting a select few corporate entities.	Imposes accountability and transparency on MHI's leadership, forcing the organization to align its actions and advocacy efforts with its stated, public purpose of promoting the entire manufactured housing industry and its role in affordable housing.

Connecting the Dots: The PESP report on Homes of America and JPMorgan Chase, the antitrust lawsuit, and MHI's silence are all symptoms of **market failure caused by a lack of law enforcement**. If government regulators and prosecutors robustly enforced antitrust laws, the MHIA, and DTS, the underlying business model for "vulture funds" and consolidators would collapse, freeing the entire industry to fulfill its potential as the most significant source of unsubsidized affordable homeownership in the U.S. (Source 5.1, 5.3)

Sources



PDF

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Hey Gemini-Q-A-AldenGlobalCapitalAffiliateHomesOfAmericaMHProNewsQ-AMHI-CodeOfEthicalConduct-NDMHAexampleFacts-Evidence-AnalysisFEA.pdf

Thank you for providing additional specific information and context, particularly the document naming Havenpark Management and the editorial note regarding their potential former membership. This allows for a more precise facts-evidence-analysis.