

Pre-publication draft for submission to third-party artificial intelligence (AI) for facts-evidence-analysis (FEA) check for a developing report on MHPProNews

Scott Susin-CMA-‘Since 2024 5 States Passed Laws Requiring Cities Allow Manufactured Homes Wherever Traditional Homes Permitted-No Evidence Earlier Such Reforms Worked.’ FHA Chattel-MHVille FEA

For the scientist, [philosopher](#), professional and all others navigating life - reality is whatever it is. According to [Scott Susin](#), an economist focused on housing finance and founder of the [Center for Mortgage Access](#) (CMA): “The [Federal Housing Administration](#), or FHA, was once a major player in lending for manufactured homes titled as personal property, helping tens of thousands of families achieve homeownership each year. Today, it insures almost none, leaving borrowers to face nearly 10% interest rates in a market dominated by three lenders.” As regular and detail-mined readers of [MHPProNews](#) know, those three lenders are [Berkshire Hathaway](#) (BRK) owned 21st Mortgage, Vanderbilt Mortgage and Finance (VMF) plus [ECN](#) owned [Triad Financial, which developed ties to Champion Homes](#) (SKY). Susin stated that those "three lenders control 76% of the [manufactured home chattel lending] market." During the Biden-Harris (D) and Trump-Vance (R) era, Susin said: "despite the efforts of both administrations, progress [at reviving the FHA Title I loan program] has been minimal. In the past five years, FHA has been able to guarantee [only a single, solitary loan](#)." "Restoring FHA's presence in this market would be a pragmatic, market-based step toward expanding affordable homeownership. It requires not a new policy framework, but only the determination by federal officials to act decisively and cut through bureaucratic inertia," wrote Susin. While much of what he said was well supported. To do a proper analysis, both what is strong and what is weak, errant or missing needs to be considered. For example, missing from his analysis is a mention of the Manufactured Housing Institute (MHI). Why does that matter? MHI has for years counted among its [members](#) the [Clayton Homes](#) (BRK) linked 21st, Vanderbilt, ECN (which acquired Triad Financial Services), and [Champion](#) (SKY). Nor was there a mention of the [Manufactured Housing Association for Regulatory Reform](#) (MHARR), which has made [Duty to Serve](#) (DTS) enforcement and a push for [Ginnie Mae revival](#) of the [FHA Title I loan](#) program part of their featured, even if frustrated, efforts. Also missing from Susin (not a tag, just a statement of fact) was mention of [Doug Ryan](#) and then [MHI VP Lesli Gooch's 'debate'](#) on why MHI allowed chattel lending programs to remain dormant (there is more in Part II, including a chart on FHA Title I endorsements). Next, Susin turned his attention to the issue of **preemption**. Earlier this week, via *Governing*, Susin sounded off on "**Manufactured Housing’s Unrealized Promise**." Much of that largely insightful article is provided in Part I.

[caption id="attachment_167862" align="aligncenter" width="600"]



"This [capital access advantage held by Clayton Homes] is likely why it and the Manufactured Housing Institute — the industry's trade association — have been unwilling to criticize the exclusion of chattel loans from the rule, even though including such loans could bolster manufactured home sales by attracting new lenders."



- Doug Ryan
Prosperity Now via op-ed
in *American Banker*.



Doug Ryan's remarks arguably apply the 'follow the money' mantra of media and investigators. Ryan ironically used the same publication - *American Banker* - that Scott Sussin used to convey his take on the FHA Title 1 program. Following the money trail, Ryan felt the need to point the finger directly at MHI and Clayton Homes. See Ryan's context and the full 'debate' with MHI's Lesli Gooch in the report linked here.

<https://www.manufacturedhomepronews.com/epic-kevin-clayton-moat-rant-analysis-lesli-gooch-debate-defense-doug-ryan-charge-end-clayton-monopoly-over-manufactured-housing-breaching-buffett-berkshire-clayton-monopolistic-moat-method/>

For the honest journalist, investigator, curious or the millions impacted by the root causes of the U.S. affordable housing crisis - the details, motivations, causes and solutions all matter.



1. [MHProNews' facts-evidence-analysis \(FEA\)](#) method of journalism endeavors to provide readers here with maximum clarity on the specifics of what has bogged down manufactured housing in the 21st century by applying the [principle of separating the wheat from the chaff](#).

Based on the FEA methodology, much of what Susin has written - shown herein - is arguably wheat. That said, regarding Susin on financing/market share topics, *MHProNews*

observes he has some glitches and thus should review the [Consumer Financial Protection Bureau \(CFPB\) HMDA data report](#).

Around 42 percent of manufactured housing loans are chattel loans, which are loans secured by the home but not the land. While this estimate is lower than estimates from other data sources, underlying differences between datasets help explain the disparities.

2. Beyond, the CFPB HMDA data, the more common figures used in manufactured housing industry circles for the percentage of purchase money provided by chattel loans financing for manufactured homes tends to hover in the 70-80 percent range.

- Per [MHI in 2025, the share of new homes financed using chattel loans is 76 percent](#).
- Per the Manufactured Housing Association for Regulatory Reform (MHARR), the [estimated percentage of homes sold via chattel loans is "over 70 percent."](#)

3. That said, as [CFPB noted](#) above: "underlying differences between datasets help explain the disparities."

With those principles and [FEA model](#) data points in mind, [MHProNews](#) edited out (...) from what follows by Susin regarding personal property (home only or "chattel") vs. mortgage financing on market share are significantly lower than any of those statements (1 and 2 above). They are also not supported by a specific source for his written statements. Susin's statements on market share by lending type (chattel vs. mortgage loans) are those omitted for the sake of clarity. Clarity, not confusion, on key details like market share matters.

The thrust of what Susin did was wheat, and this analysis keeps his wheat while respectfully toss the chaff.

That wheat follows in Part I.

4. This MHVille [FEA](#) is underway.

MHVille[®]

Definition

“MHVille” is a term that refers to the **Manufactured Housing Industry** and its related trades, associations, and connected interests.



All Interacting in the **World of Manufactured Housing & Communities.**





Part I. By CMA's [Scott Susin via Governing](#) provided by MHPProNews under [fair use guidelines](#) for [media](#). Note that a segment about what percentage of loans are chattel or financed by mortgages are omitted (... see notes above).

Manufactured Housing's Unrealized Promise

State zoning reforms to remove barriers to factory-built homes have done little to close the housing gap. There are steps state and federal policymakers should take to boost this affordable option.

OPINION | May 18, 2027 •

Scott Susin, Center for Mortgage Access

More states are enacting “equal-treatment” laws requiring localities to permit manufactured housing wherever traditional single-family homes are allowed. At least five states — [Kentucky, Maine, Maryland, Montana](#) and, most recently, [Virginia](#) — have passed such laws since 2024. Legislators hope that knocking down local zoning barriers to affordable factory-built homes, particularly those intended to be installed on a permanent foundation, will help fill the country's housing gap.

But the evidence suggests these reforms have not worked. In [new research for my organization](#), I find that states with equal-treatment laws do not, on average, have higher shares of manufactured housing than states without them, after controlling for income, population density and climate. A 2024 [Harvard Joint Center for Housing Studies report](#) found a similar pattern in the data (although the authors question whether the relationship is causal). Policymakers enacting new equal-treatment laws or enforcing existing ones need to reckon with the fact that these laws have delivered little so far.

Manufactured homes [of all types](#) are the largest source of unsubsidized affordable housing in the United States, serving [roughly 7 million households](#), more than [every Department of Housing and Urban Development-subsidized program combined](#). A typical manufactured home on a quarter-acre lot [costs about 30 percent less](#) than a site-built equivalent, cutting a monthly mortgage payment by \$585 in 2025 dollars. It is a particularly important route to homeownership for lower-income families and for Hispanic and Native American households, who use it at higher rates than white Americans. Yet production remains [more than 70 percent below its 1998 levels](#).

Even in the states most favorable to manufactured housing, shares exceed predictions by only a few percentage points. Four of the seven states where shares most exceed predictions — Maine, Michigan, Oregon and Washington — have equal-treatment laws. But so do three of the six states with the largest shortfalls: Iowa, Kansas and Nebraska. Whatever separates receptive states from unreceptive ones, the presence of a state statute is not it.

Why not? State zoning laws are attempts to override local governments, and cities have many tools to resist. Where a state lifts one restriction, a locality can substitute another. “Look-alike” ordinances requiring new homes to match the neighborhood are hard to meet for manufactured homes with steel siding and shallow roof pitches. Vague aesthetic standards give review committees leeway to reject them outright.

And some localities simply ignore state law: A 2024 survey of upstate New York metros found, for example, that at least 80 percent of local governments restrict manufactured homes to “leasehold” communities, where the underlying land is rented, or ban them outright, despite a state equal-treatment statute. Governors are often reluctant to sanction recalcitrant mayors. Using results from one recent study, I estimate that an equal-treatment law raises the probability of a locality permitting manufactured housing only from 59 percent to 66 percent.

Patterns of local resistance echo those seen with other state attempts to boost housing supply. When California barred localities from prohibiting accessory dwelling units in 2016, for example, cities responded with “[poison pills](#)” such as onerous parking and setback requirements. The state needed several more rounds of legislation, between 2019 and 2022, before ADU permits surged.

...

The lesson for policymakers is twofold. First, passing a law is not the same as enforcing one. States serious about expanding manufactured housing need to police poison-pill ordinances, monitor local compliance and follow California's example of iterative legislation. Second, zoning reform needs a federal partner. Expanding government-backed mortgage access for manufactured homes, particularly those on leased land, is the missing piece. Without it, even the best-drafted state law will run into a financing wall.

State governments cannot revive the manufactured housing market on their own. But writing better laws and ensuring they are followed would be a good place to start.

-- [MHProNews](#) notes that there is more from Susin on manufactured housing that may be explored in a future report. --

Part II. More [MHProNews](#) [Expert](#) Commentary on above from CMA's Scott Susin.

1. Perhaps a key component of Susin's thesis via *Governing* is that state level preemption 'mandates' may or may not be properly implemented. Quoting.

- ***"But the evidence suggests these reforms have not worked."***
- ***"Why not? State zoning laws are attempts to override local governments, and cities have many tools to resist."***
- ***"Where a state lifts one restriction, a locality can substitute another."***

In effect, the [publicly available national manufactured housing production and top ten shipment state data from MHARR](#) tends to support those remarks. Even though demand for

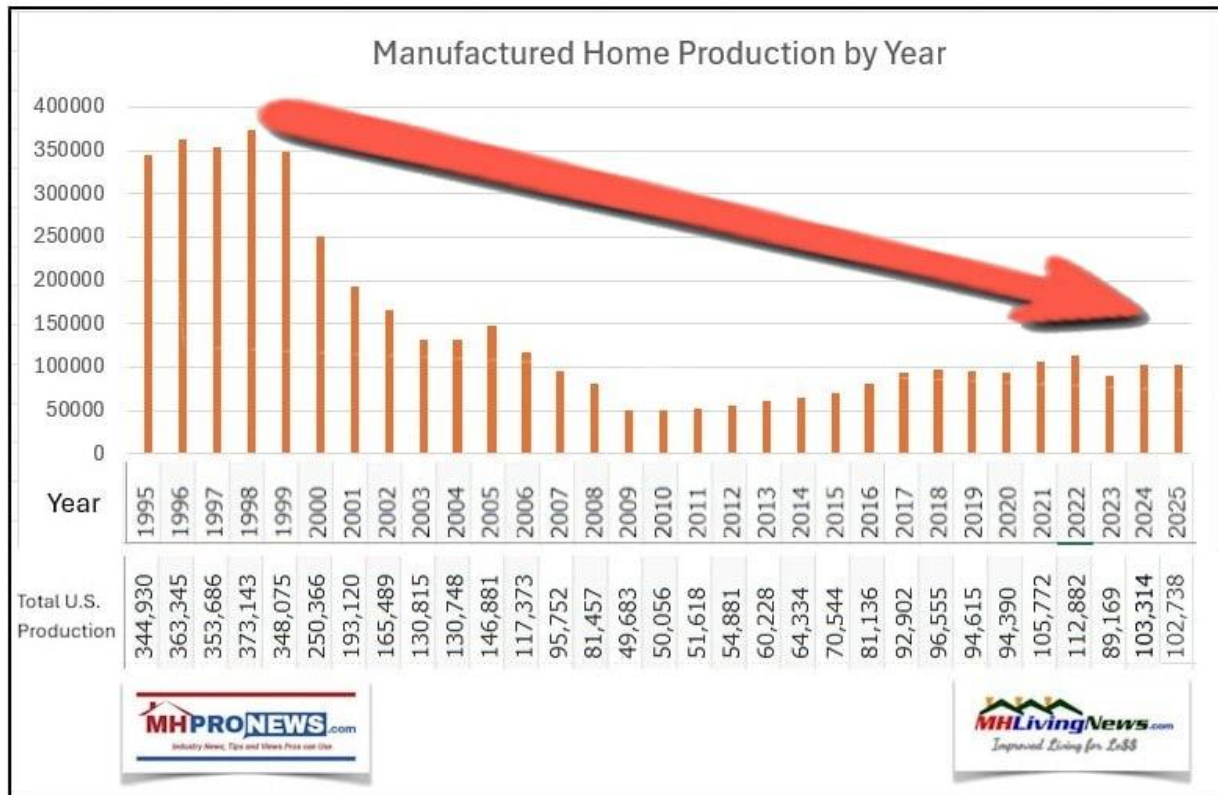
affordable housing is strong, and even though Freddie Mac research asserted that "[most consumers would consider a manufactured home](#)," and even though several states have been deploying statewide preemption laws (as Susin aptly pointed out), production declined modestly from 2024 to 2025.

2. Quoting [MHARR](#).

...statistics indicate that HUD Code manufacturers produced 6,800 new homes in December 2025, a 3.9% decrease from the 7,078 new HUD Code homes produced in December 2024. Cumulative production for 2025 thus totals 102,738 new HUD Code homes, as compared with 103,314 new HUD Code homes in 2024, a .55% decrease.

3. Logically, as local zoning barriers are supposedly lifted via statewide preemption laws, there ought to be a surge in shipments into that state and thus a surge in production nationally. But that has not been the case, as the MHPProNews/MHLivingNews production by year from 1995-2025 reflects.

[caption id="attachment_228773" align="center" width="650"]



<https://www.manufacturedhomepronews.com/total-2025-u-s-manufactured-home->

[production-data-mhpronews-and-kovach-vs-manufactured-housing-institute-mhi-and-lesli-gooch-affordable-housing-and-mhville-facts-evidence-analysis-fea/](#) [/caption]

4. Susin also aptly pointed out to the struggles to get ADU production boosted in California. MHPProNews/[MHLivingNews](#) have been making a similar point based on the evidence for years, including using images and research like the one below.

[caption id="attachment_168239" align="aligncenter" width="650"]

Chart of the week

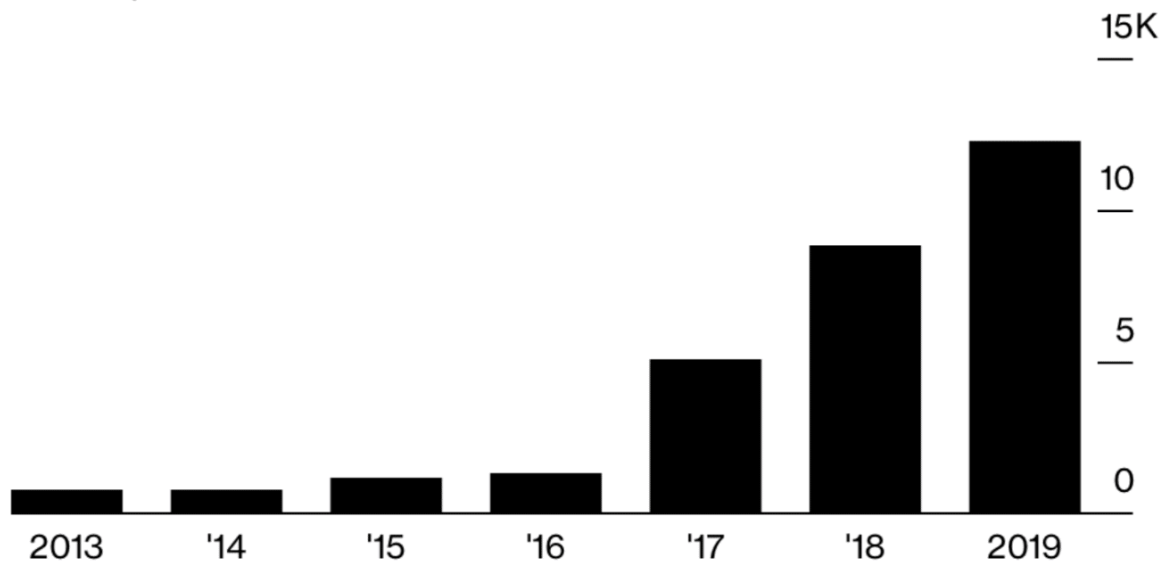
The key word in Bloomberg CityLab's summary is "preemption" as in "preemption of local zoning."

Chart of the week: ADU construction takes off in California

Bloomberg CityLab [explores](#) the boom in accessory dwelling unit (ADU) construction in California, following the state legislature's [preemption of local zoning codes](#) to legalize them in 2016. As a result of the legislature's action, "there's a meaningful amount of housing units being put into neighborhoods that were traditionally very low-density," according to one ADU manufacturer.

Accessory dwelling units (ADUs) are rising steadily across California

■ ADU permits



California Department of Housing and Community Development



HUD Code manufactured housing already enjoys federal "enhanced" "preemption."

The Manufactured Housing Improvement Act of 2000 (MHIA or 2000 Reform) law says: "Federal preemption under this subsection shall be broadly and liberally construed..." phrasing. Manufactured housing's "federal preemption" is often called "enhanced preemption" for that reason. What this graphic from MHI "coalition partner" NHC reveals is that when preemption for ADUs went into effect in California, production virtually tripled overnight. Logically, if MHIA's "enhanced preemption" was fully enforced, manufactured housing could skyrocket. The Bloomberg/NHC graphic suggests that it continued to surge over 3 years to some 700 percent growth. The Manufactured Housing Association for Regulatory Reform (MHARR), MHPRONews, others have called for the 2000 Reform enforcement.

<https://www.manufacturedhomepronews.com/manufactured-housing-institute-mhi-reviewing-biden-housing-plan-mhi-coalition-partner-national-housing-conference-exposes-mhi-claimed-manufactured-housing-leader/>

and <https://www.manufacturedhomepronews.com/what-is-an-accessory-dwelling-unit-adu-or-a-detached-accessory-dwelling-unit-dadu-the-role-of-adus-in-easing-americas-housing-crisis-by-emily-hamilton-examined-plus-mhville-market-upda/>

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5. With that in mind, quoting Susin.

"First, passing a law is not the same as enforcing one. States serious about expanding manufactured housing need to police poison-pill ordinances, monitor local compliance and follow California's example of iterative legislation. Second, zoning reform needs a federal partner."

Bingo: "passing a law is not the same as enforcing one." That pithy observation by Susin could be a useful summary of Susin aptly said was **"Manufactured Housing's Unrealized Promise."** That unrealized promise, or past achievements vs. currently tepid results, are puzzle pieces in the tragic and true story of the Duty to Serve (DTS) on chattel lending and the ["enhanced preemption"](#) provision of the 2000 Reform Law.

[caption id="attachment_212150" align="aligncenter" width="600"]



<https://www.manufacturedhomepronews.com/minneapolis-fed-economic-writer-jeff->

[horwich-learning-from-first-and-only-manufactured-housing-boom-spotlights-elena-falcettoni-mark-wright-james-schmitz-jr-research-where/](https://www.manufacturedhomepronews.com/mass-production-of-homes-in-u-s-factories-first-and-only-experiment-was-tremendous-success-by-elena-falcettoni-james-a-schmitz-jr-mark-l-j-wright-plus-sunday-weekly-mhville-head/) [caption][caption id="attachment_208281" align="aligncenter" width="600"]



Elena Falcettoni
Senior Economist
Ph.D., Economics,
Univ of Minnesota



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

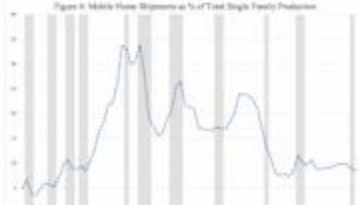


Federal Reserve Bank of St. Louis
Mark L. J. Wright | St. Louis Fed

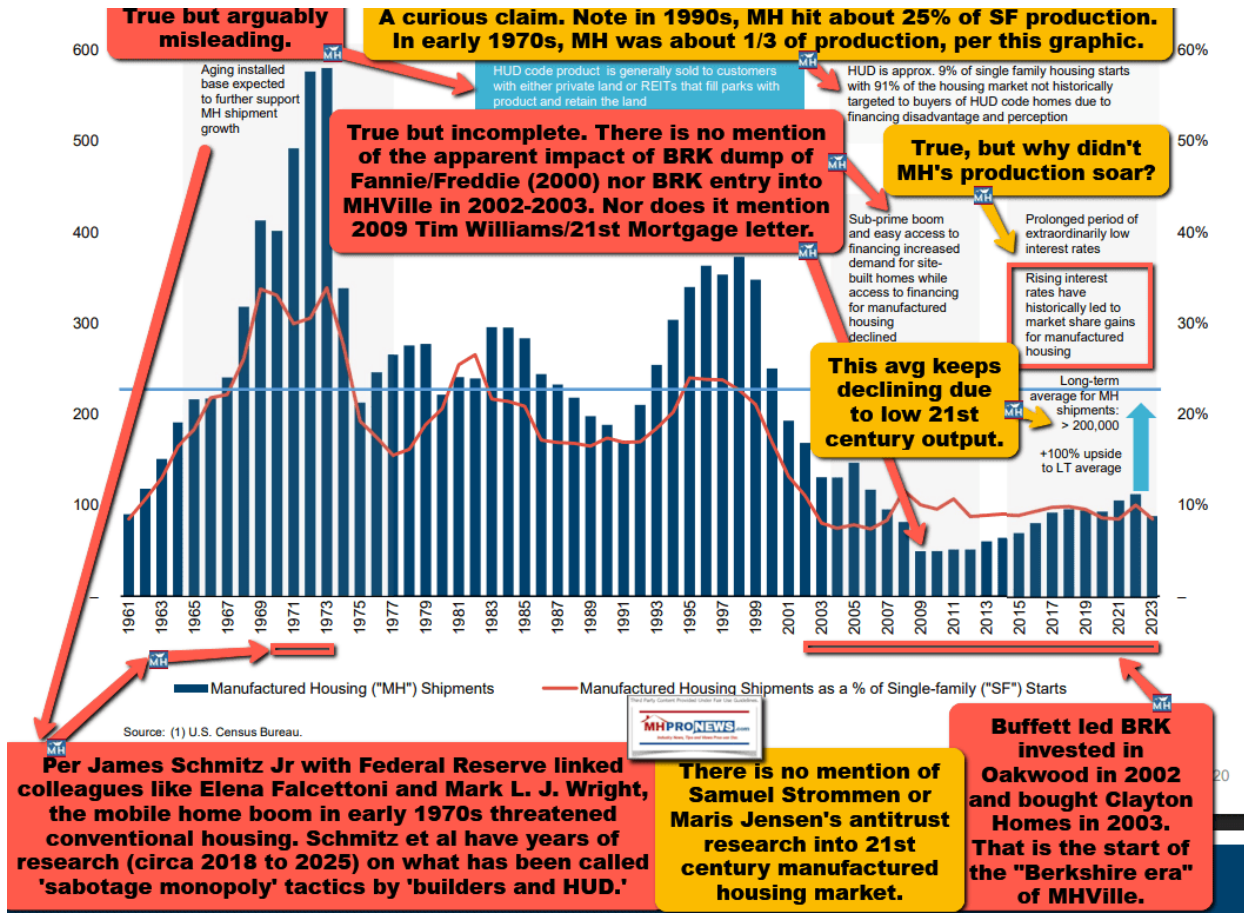
Mass Production of Houses in Factories in the United States:
The First and Only "Experiment" Was a Tremendous Success*

Mass Production of Homes in U.S. Factories 'First and Only Experiment Was Tremendous Success' by Elena Falcettoni-James A. Schmitz Jr-Mark L. J. Wright;

PLUS
SUNDAY
WEEKLY
MHVILLE
HEADLINES RECAP



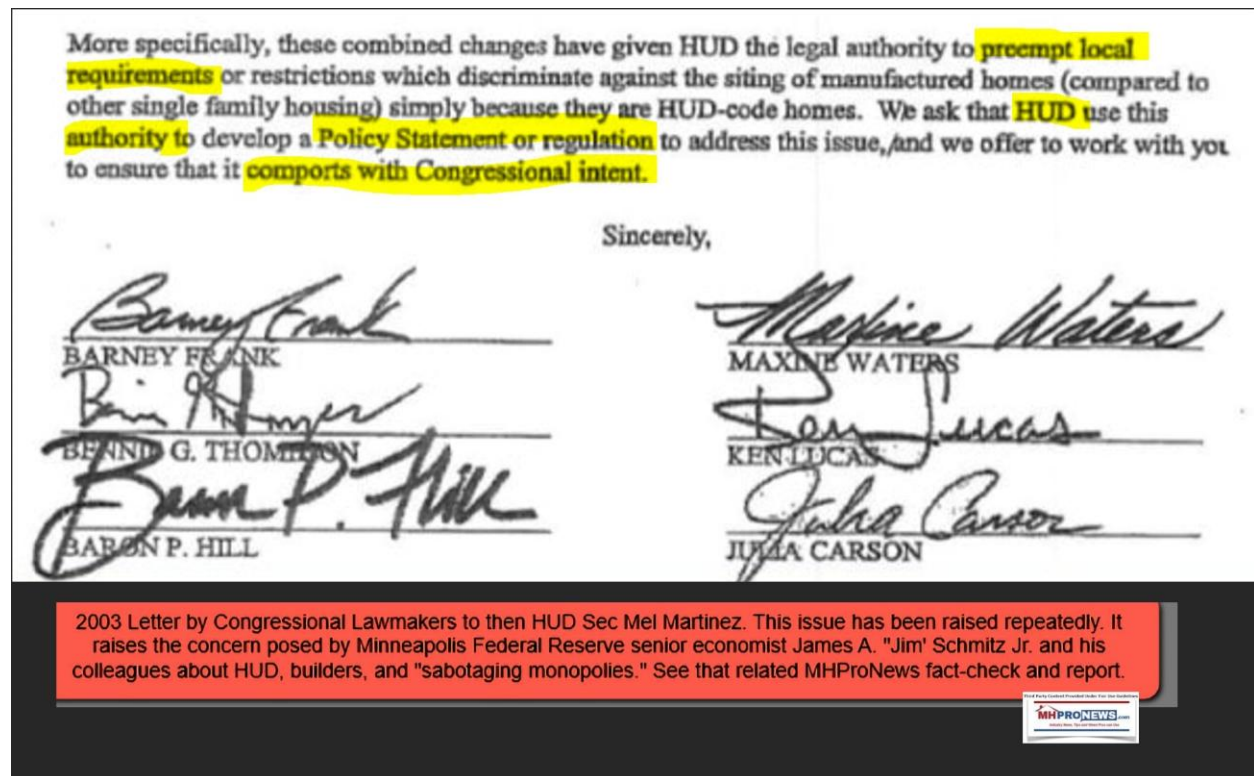
<https://www.manufacturedhomepronews.com/mass-production-of-homes-in-u-s-factories-first-and-only-experiment-was-tremendous-success-by-elena-falcettoni-james-a-schmitz-jr-mark-l-j-wright-plus-sunday-weekly-mhville-head/> [caption][caption id="attachment_213683" align="aligncenter" width="648"]



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6. While much of what he said about state preemption is well supported or true, there are evidence-based reasons to believe that Susin was seemingly unaware of federal preemption under the Manufactured Housing Improvement Act of 2000 (a.k.a.: MHIA, MHIA 2000, 2000 Reform Act, 2000 Reform Law). A check of his work reveals no reference to that term or of the "[enhanced preemption](#)" provision under the 2000 Reform Law.

[caption id="attachment_171178" align="aligncenter" width="650"]



Several of the illustrations shown in this report can be opened in many browsers to reveal a larger size. To open this picture, click the image once. When the window opens, click it again to reveal the larger size photo. Use your browsers back key to return to the article. <https://manufacturedhousingassociationregulatoryreform.org/wp-content/uploads/2025/03/House-Democrats-Financial-Services-Committee-Nov-2003-HUD-Secretary-Mel-Martinez-Manufactured-Housing-Improvement-Act-Enhanced-Preemption-Intent-Fax.pdf>[caption]

Part III. Additional Information Related to Topics Raised by Scott Susin from Sources as Shown, Including **What Warren Buffett, Kevin Clayton, more from the MHI orbit plus Bud Labitan said about manufactured home lending.**

In no particular order of importance, part of what Susin missed is arguably due in part because the "Manufactured Housing Institute" has in several respects failed to deliver on the meaning of the term "institute."

[caption id="attachment_217718" align="aligncenter" width="652"]



Define institute as is used by nonprofits.



In the context of nonprofits, an **institute** refers to an organization established to advance research, education, or public policy in a specific field. It typically focuses on generating knowledge, conducting studies, or promoting advocacy through programs, publications, or events. Nonprofits use the term "institute" to signal a formal, mission-driven entity dedicated to intellectual or societal goals, such as policy analysis, academic research, or community education. For example, the Florida Industrial and Phosphate Research Institute, mentioned in your article, conducts research to advance phosphate-related industries, including rare earth mineral extraction. The term implies credibility, expertise, and a structured approach to achieving the nonprofit's objectives.

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[caption id="attachment_212763" align="aligncenter" width="656"]

Part I Summary

1 Briefly describe the organization's mission or most significant activities
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

MHI President Richard "Dick" Jennison signs this IRS 990 statement under penalties of perjury.

There are numerous common-sense steps that the Manufactured Housing Institute (MHI) could take to accomplish this stated mission to "improve the overall operating environment of 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." But oddly, MHI has often ignored the common sense in favor of approaches that have for well over a decade not worked in the marketplace. For instance, it was arguably illogical to improve manufactured housing acceptance to launch a new product eventually called CrossMods, when what the common-sense step would have been to boost the understanding of all manufactured homes. That noted, following the late 2018 launch by MHI of what became their CrossMods campaign, new manufactured home sales dipped for 2.5 years.

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“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 for 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. [/caption][caption id="attachment_218231" align="aligncenter" width="600"]

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UNITED STATES SENATE COMMITTEE ON
BANKING, HOUSING, & URBAN AFFAIRS

**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**

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

1. In broad brush terms, Susin is mostly correct.

- There is a pressing need for more competitive chattel lending and there is a need to overcoming zoning barriers to facilitate the sales and thus production of more HUD Code manufactured homes.

Those are topics MHPProNews and MHLivingNews have championed since their respective inceptions. In the AI era, visual illustrations often help spotlight those two key points. For example.

[caption id="attachment_232072" align="aligncenter" width="650"]

THREE MANUFACTURED HOUSING Regulatory Roadblocks — and How to Fix Them! —

OVERCOME LOCAL ZONING BARRIERS!
Enforce MHIA 2000's Enhanced Preemption
CITY ORDINANCE WALL
FEDERAL LAW
Richland, MS shows it can be done—**Enforce federal preemption to stop unfair zoning bans!**

Fix DUTY TO SERVE FINANCING!
Apply HERA 2008's DTS to Chattel Loans
Fannie Mae
Freddie Mac
COMMUNITY CONSOLIDATORS
NO DTS
DTS turned on its head—Investors get cheap loans as site fees rise, while Homebuyers get no DTS support. Why, when MH homes often appreciate faster than conventional housing?

REPEAL COSTLY DOE ENERGY MANDATES!
MHARR & MHPProNews Pushed MHI-Gas Industry Sued Fast
Swift Lawsuit
Watered Down Bill
SMALL PRODUCERS CLOSED
Pending Housing Bill Weakened—
MHARR Demands Repeal & Fair Standards!

MHI Postures-While Consoliation Continues; MHARK Clear, Consistent, and Wants Level Playing Fieel!
Robustly Enforce Existing Laws—Add MHARR Amendments to Pending Legislation for More Affordable Homes!

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Enhanced Preemption

“What is, and why it matters?”



Manufactured Housing
Improvement Act of
2000

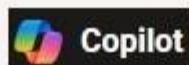
Why Does It Matter?

- Provides more affordable housing options
- Supports economic growth
- Prevents costly legal battles

Why Does It Matter?

- Provides more affordable housing options
- Supports economic growth

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[caption id="attachment_216345" align="aligncenter" width="760"]

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Make the infographic.

Copilot

Here's your custom infographic—designed to show how specific federal laws apply to different abuses within the manufactured housing industry landscape. Let me know if you want a companion slide deck or printable advocacy handout to reinforce these connections.

ENFORCE THE LAWS

MHIA (2000)
Icon: House

SECURITIES
SEC rules to prevent misleading investors

DTS (2008)
Icon: Dollar sign

RICO
Icon: Document with dollar sign

ANTITRUST
Duty to Serve, manufactured housing, other federally supported financing options
Icon: Handshake

RICO
Criminal penalties for fraud and collusion

SECURITIES
SEC rules to prevent misleading investors

HOBBS ACT
Criminal penalties for extortion or threats
Icon: Gavel

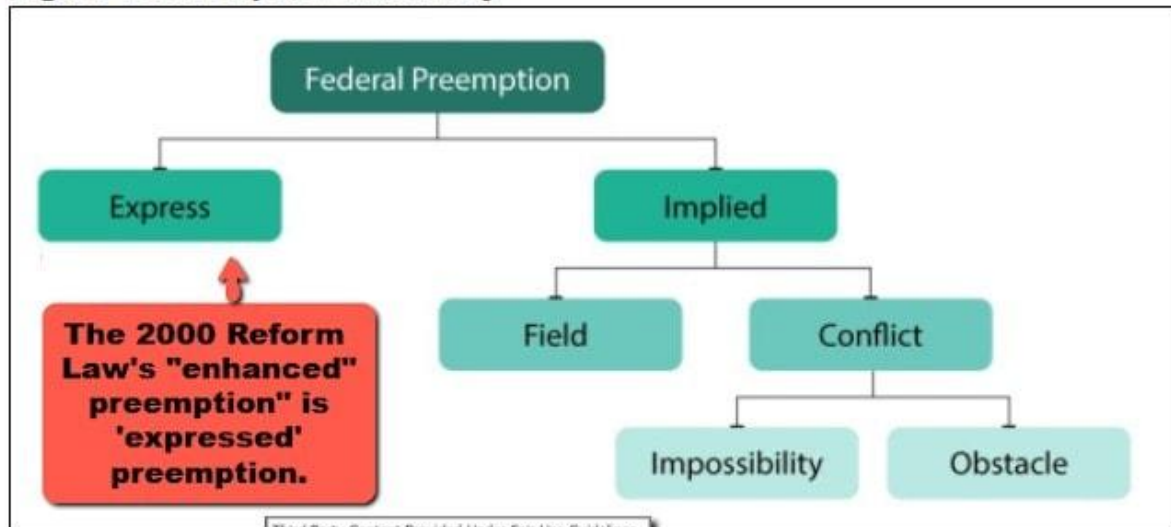
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2. But facts and evidence need to back statements with as much precision as possible, in order to stand up to close scrutiny. So, for example, on the topic of federal preemption, from the Congressional Research Service (CRS).

[caption id="attachment_214104" align="aligncenter" width="678"]

Figure 1. Preemption Taxonomy



Source: CRS.



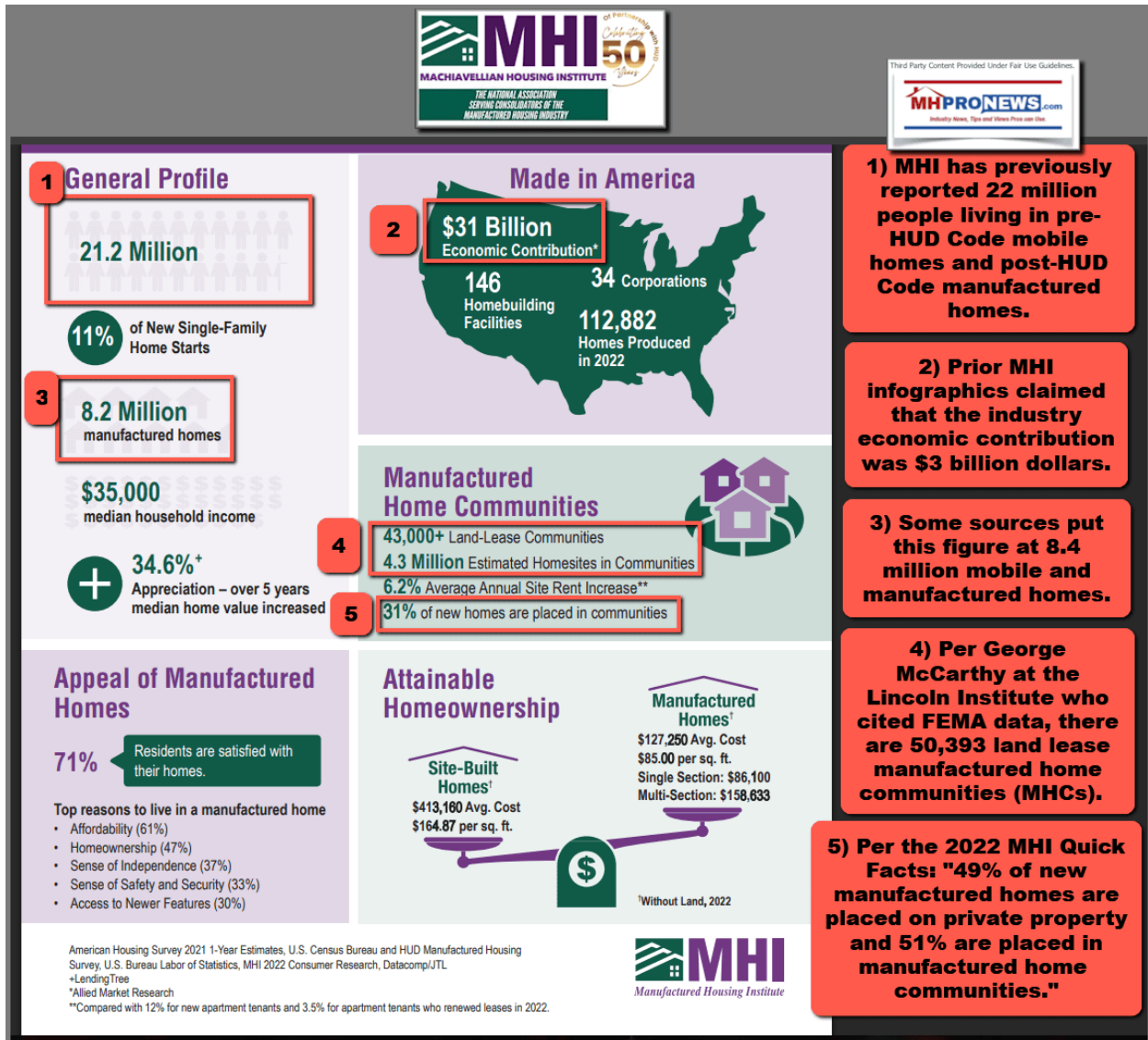
<https://www.manufacturedhomepronews.com/congressional-research-service-on-federal-preemption-legal-key-can-unlock-far-more-mh-sales-expert-views-insights-into-manufactured-housing-improvement-act-enhanced-preemption-importance-fea/>

[/caption]

3. Next, to dot the i's and cross the t's about MHI's "Quick Facts" or "Industry Overview" and their recent omission of those once annual and publicly available documents. Unlike MHARR, MHI for years has claimed to represent "[all segments](#)" of the manufactured housing industry. Words like "represents" have meaning. A sample of [MHI's previously public](#) "Quick Facts" or "Industry Overview" is linked [here](#). The challenge with MHI's past data is that they have had a checkered history of both accurate and inaccurate information. While production and shipments rise and fall, the total population living in manufactured homes didn't suddenly fall (for example) from their previously stated 22 million. Unlike corrections requested by MHPProNews directed to the [National Association of Home Builders](#) (NAHB) or the National Association of Realtors (NAR) Scholastica "Gay" Cororaton (see [footnote 1 on page 48](#)), [MHI ignores those requests](#), even when it is pointed out that several of their claims are contradicted by their own members, by prior MHI statements, by other sources, or applied common sense.

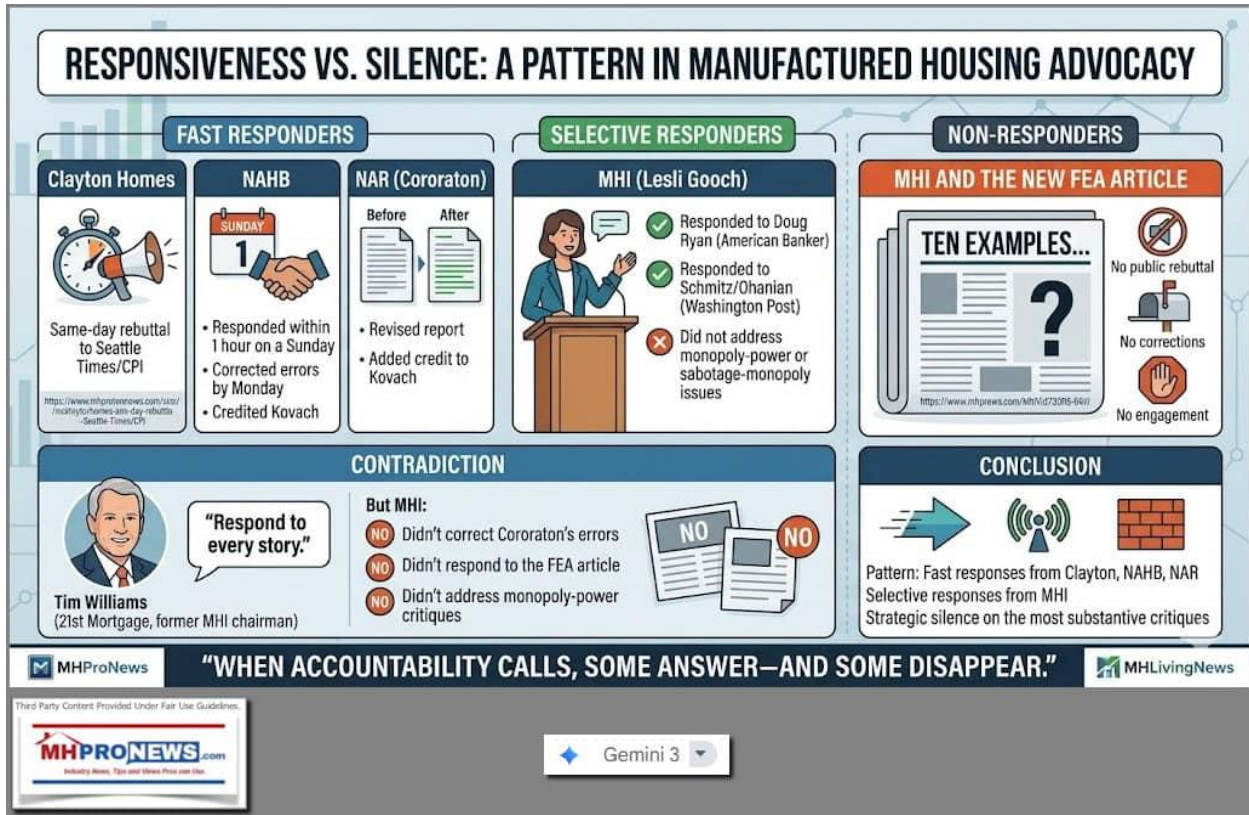
So, [the FEA methodology](#) and the [principle of applying the wheat from the chaff](#) must arguably be robustly applied to the disconnect between *what MHI says* vs. what MHI does in the 21st century. MHARR, by contrast, is consistent, as [multiple AI systems](#) have confirmed both of those observations. More examples that as it applies to Susin's research further below.

[caption id="attachment_224911" align="aligncenter" width="651"]



For evidence of some of the cited contradictions where MHI data contradicts MHI data, see this link here: <https://www.manufacturedhomepronews.com/wp-content/uploads/2023/04/2022-MHI-Quick-Facts-updated-05-2022-2-August2022updateMobileHomeManufacturedHomeMHProNewsFactCheckAnalysis.pdf> and here: <https://www.manufacturedhomepronews.com/wp->

[content/uploads/2023/04/2022-MHI-Quick-Facts-updated-05-2022-2-August2022updateMobileHomeManufacturedHomeMHProNewsFactCheckAnalysis.pdf](https://www.manufacturedhomepronews.com/wp-content/uploads/2023/04/2022-MHI-Quick-Facts-updated-05-2022-2-August2022updateMobileHomeManufacturedHomeMHProNewsFactCheckAnalysis.pdf)
 and Jason Boehlert's MHI presentation page 21
<https://www.manufacturedhomepronews.com/wp-content/uploads/2021/07/ViaSlideshared2manufacturedhousing-jasonboehlert-mhi-121214135140-phpapp02ManufacturedHomeProNewsFactCheckAnalysis.pdf>[/caption][caption id="" align="aligncenter" width="660"]



From time to time, an AI offers to create an illustration to help graphically convey important ideas during the course of a FEA check. At times, MHPProNews has accepted those offers and they have resulted in infographics like the one above. [/caption]

3. Objectively, much (not all) of what Susin said has been expressed by others. His thesis could be strengthened, going forwards, by specifically citing and/or linking those who have made the same or similar points. For [example](#), just days before his article on *Governing*.

According to the Manufactured Housing Association for Regulatory Reform (MHARR) President and CEO, Mark Weiss, J.D.: **"Discriminatory zoning exclusion is at the root of the industry's stagnant production levels and a major contributor to the nation's affordable housing crisis. For this issue to be excluded, in any mandatory context, from bills that, according to their authors and supporters, are designed to spur and**

revitalize the availability of affordable housing, is unfathomable, as is [the Manufactured Housing Institute's] MHI's apparent failure to publicly support MHARR's effort to include a preemption-based zoning remedy in those bills." From the full MHARR research document (Part II): "This legal triad ensures major production cost savings for manufactured home producers, which are then passed-on to manufactured homebuyers:" "(1) uniform federal standards; (2) uniform federal enforcement; and (3) federal preemption to prevent the imposition or enforcement of disparate, non-identical standards by state and/or local governments." MHARR's remarks are similar to those of Legacy Housing's Executive Chairman Curt Hodgson during a recent earnings call (see Part III):

But we still struggle on where you're going to put them [i.e.: HUD Code manufactured homes]. We don't have a lot of vacant spaces in big cities. We don't have very many mobile home parks coming online, although, as you know, we're trying to do things in Texas. But we don't have a good answer to where we're going to put them. Lots of headwinds. And the industry itself has not grown in and filling that void, and they haven't grown on providing a neighborhood solution as the traditional home builders have, of which I know you follow many of them.

4.

5.