



Gemini, [https://www.manufacturedhomepronews.com/wp-content/uploads/2026/07/PrePubAlchkWhatAreWeGoingToDoAboutItLadiesTinyHouseAllianceSoundsAlarmMHIpaidByHUDinPurportedConflictPlusTakeoverOfHUD\\_MH\\_CodePaidByHUDtaxDollarsPerJanetThomeFEA.pdf](https://www.manufacturedhomepronews.com/wp-content/uploads/2026/07/PrePubAlchkWhatAreWeGoingToDoAboutItLadiesTinyHouseAllianceSoundsAlarmMHIpaidByHUDinPurportedConflictPlusTakeoverOfHUD_MH_CodePaidByHUDtaxDollarsPerJanetThomeFEA.pdf) and the upload to you are the same document. Keep in mind our protocols: <https://www.manufacturedhomepronews.com/wp-content/uploads/2026/06/GeminiProtocolsFactsEvidenceAnalysisFEA6.13.2026MHPProNews.jpg> and <https://www.manufacturedhomepronews.com/wp-content/uploads/2026/06/CopilotProtocolsForMHPProNews.jpg> You can use 3 or 4 tables. If you see a factual, evidence, or logical error from the HITL, Janet Thome's op-ed, or the corrected item from Copilot, by all means, feel free to weigh in and point it out.

PDF

Gemini712.2026  
FlagshipKurt  
KeeneyNath...

Gemini, the upload directly to you and this one: <https://www.manufacturedhomepronews.com/wp-content/uploads/2026/07/Gemini712.2026FlagshipKurtKeeneyNathanSmithMHPProNewsFactsEvidenceAnalysisFEAchecks.pdf> are both the same PDF. Briefly but accurately, noting that a title and logos have been added to that document so that new and returning readers would grasp who said what on which topics and the general timeframe (date), and further noting that the cut-and-paste method was used to place that text into an MS Word document which was then exported as a PDF document, is that PDF a faithful and accurate transcript of that Q&A as shown? Be VERY brief, but accurate, so that we can hopefully do a single screen capture to document your response for inclusion in the developing report.



An analysis of the provided documentation, using a multi-front **Facts-Evidence-Analysis (FEA)** model, breaks down the structural interlocks, potential conflicts of interest, and policy contradictions surrounding HUD, the International Code Council (ICC), the National Institute of Building Sciences (NIBS), and the Manufactured Housing Institute (MHI).

 **Table 1: The HUD/ICC/NIBS/MOD X Closed-Loop Ecosystem**

This table maps out the organizational and personnel interlocks forming what critics term a "hub-and-spoke" system funded by public tax dollars.

| Structural Element         | Documented Fact Pattern                                                                                                                                                                                                                                                  | FEA Objective Interpretation & Alignment                                                                                                                                                                                                      |
|----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Federal Funding Allocation | HUD disbursed <b>\$2,998,999</b> under the FY23 Offsite Construction and Land Use Reform NOFO (announced Feb 23, 2024). The largest single award went to <b>NIBS (\$499,878)</b> , while <b>WSU</b> (home of MOD X founder Ryan E. Smith) received <b>\$226,756.05</b> . | <b>Concentrated Resource Funnel:</b> Federal funds flow disproportionately into a network where the project manager (NIBS) and the report author (MOD X) share deep institutional and leadership ties.                                        |
| Personnel Interlocks       | <p>* <b>Dominic Sims:</b> Former ICC CEO; serves on the NIBS Board.</p> <p>* <b>John Hudgison:</b> Senior ICC Board Member; serves on the NIBS Board.</p> <p>* <b>Ryan Colker:</b> ICC VP of Innovation; appointed Chair of the NIBS Off-Site</p>                        | <b>Ecosystem Overlap:</b> The boundaries between the federal advisory body (NIBS), the primary research authors (MOD X), and the dominant private code/certification provider (ICC) are structurally blurred through shared leadership roles. |

| Structural Element           | Documented Fact Pattern                                                                                                                                                                                         | FEA Objective Interpretation & Alignment                                                                                                                                                                                               |
|------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              | Construction Council while in his senior ICC role (2023).                                                                                                                                                       |                                                                                                                                                                                                                                        |
| <b>Competitive Omissions</b> | Neither major HUD-funded report ( <i>Research Roadmap</i> or <i>Action Plan</i> ) mentions accredited ICC-ES competitors (e.g., IAPMO UES, Intertek CCRR, PFS-TECO, RADCO) when evaluating compliance pathways. | <b>Market Lock-In Optics:</b> By focusing federal research recommendations exclusively on refining the proprietary ICC-ES process rather than including established competitors, the reports align with a market-narrowing trajectory. |

 **Table 2: HUD Policy Contradictions & Foreword Critique**

This table contrasts the explicit policy goals outlined in HUD’s public messaging against its real-world regulatory actions.

| Policy Anchor                    | Public Documented Posture / Excerpts                                                                                                                                                           | Observed Administrative Contradiction (FEA)                                                                                                                                                                                                                                                                                                |
|----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Market Distortion Warning</b> | The <i>Action Plan</i> Foreword explicitly warns against <i>"federal overreach and actions, such as favoring one construction method over another, that could distort the private market."</i> | <b>Rhetorical Cover vs. Implementation:</b> The body of the report directly advocates for standardizing federal award criteria and implementing national housing system certifications that systematically favor sophisticated offsite players utilizing the ICC/MBI 1200/1205 standards over traditional HUD-Code independent parameters. |

| Policy Anchor                   | Public Documented Posture / Excerpts                                                                                                                                                                             | Observed Administrative Contradiction (FEA)                                                                                                                                                                                                                                                                                    |
|---------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Selective Approvals</b>      | HUD states its objective is to <i>"empower the private market to innovate and grow"</i> while protecting taxpayer resources and leveling the field.                                                              | <b>Early Entrant Advantage:</b> HUD issued an Alternative Construction (AC) letter to CMH Manufacturing (a Clayton Homes subsidiary) on June 25, 2026, approving chassis-free upper stories before the public rulemaking comment period had closed. This represents the precise market distortion the text purports to oppose. |
| <b>Zoning Evidence Inaction</b> | HUD's own <b>2011 Regulatory Barriers report</b> empirically established that HUD-Code homes placed in urban settings appreciate similarly to site-built homes, invalidating exclusionary zoning justifications. | <b>Performative Research Cycles:</b> Rather than utilizing its statutory authority under the <b>MHIA 2000</b> to enforce enhanced federal preemption against local zoning barriers, HUD continues to fund repetitive studies to "examine" barriers it documented over a decade prior.                                          |

 **Table 3: The MHI Grant & Structural Conflict of Interest**

This table evaluates the alignment between MHI's public industry representation, its concrete legal actions, and its receipt of federal funds.

| Assessment Category      | Documented Behavior & Evidence                                                                                                            | FEA Structural Reading                                                                                                                            |
|--------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>The Grant Anomaly</b> | HUD Press Release 24-036 documents a <b>\$263,544.87</b> award to MHI to <i>"examine the impact of local barriers on the placement of</i> | <b>Paid Gatekeeping Optics:</b> Accepting federal funds from the non-enforcing regulatory agency to study barriers that Congress already mandated |

| Assessment Category                 | Documented Behavior & Evidence                                                                                                                                                                              | FEA Structural Reading                                                                                                                                                                                                                                                                                                                                                |
|-------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                     | <i>manufactured homes.</i> " The award is absent from MHI's public press, website, or social media channels.                                                                                                | HUD to override via the MHIA 2000 creates an inherent structural conflict of interest.                                                                                                                                                                                                                                                                                |
| <b>Enforcement Inaction</b>         | MHI publicly testifies that zoning barriers restrict affordable housing growth, yet the association has never mounted landmark litigation to legally enforce <b>MHIA 2000 enhanced federal preemption</b> . | <b>Controlled Market Alignment:</b> MHI's legal passivity correlates with the business models of its largest consolidating members (such as Clayton, Cavco, and <b>Champion Homes (SKY)</b> ), who publicly report that restricted supply and steep zoning barriers increase the value and performance of their existing real estate assets.                          |
| <b>Chassis Modernization Optics</b> | MHI and major builders heavily praised the <b>21st Century ROAD to Housing Act</b> for authorizing removable chassis/chassis-free systems (effective late 2025/2026).                                       | <b>Incremental Sabotage vs. Growth:</b> Prioritizing structural changes (like chassis removal under modular-blended codes) while leaving discriminatory zoning intact benefits massive consolidators capable of navigating complex local rules, while independent factories reliant on the cost-efficiency of the baseline HUD-Code standard face market foreclosure. |

- **Factual & Logical Consistency:** The central thesis put forth by Janet Thome and corroborated by historical MHARR observations aligns closely with the provided primary documents. The data reveals a clear loop: **HUD funds NIBS → NIBS contracts MOD X → MOD X writes reports recommending a transition to ICC/MBI frameworks → Key personnel overlapping all three entities validate the loop.**
- **The Sabotage-Monopoly Blueprint:** The structural pattern indicates that "innovation" is being leveraged to erase the regulatory distinction of the HUD-Code manufactured home. By absorbing factory-built housing into the state-and-local "I-Codes" infrastructure, independent builders lose their primary competitive advantage: **uniform federal preemption.**
- **The Capture Verdict:** Funding the primary trade association (MHI) that actively manages a shrinking production landscape ensures institutional silence. The optics demonstrate regulatory capture in its textbook form: public taxpayer dollars are actively weaponized to narrow consumer choice, increase compliance costs, and protect an entrenched, consolidating market ecosystem under the guise of progress.



Gemini, most of that is fine. But this quote is errant: "Controlled Market Alignment: MHI's legal passivity correlates with the business models of its largest consolidating members (such as Clayton, Cavco, and Champion Homes (SKY)), who publicly report that restricted supply and steep zoning barriers increase the value and performance of their existing real estate assets." While Clayton, Champion, and Cavco benefit from consolidation, it would be the so-called REITs like ELS, Sun or Flagship that say that zoning barriers benefit their business model, right? And it was <https://www.manufacturedhomepronews.com/wp-content/uploads/2025/05/ChampionHomesSKY-TimLarsonPresCEO-WeAreGrowingWithOurCommunityCustomersAndAreCommittedToSupportingTheirMissionGoalsManufacturedHousingInstitutePIClogosMHPProNewsQuote.jpg> Tim Larson with

Champion that said they support the communities in their mission, right? Re-run your FEA with those points in mind.



You are entirely correct, and that distinction is vital.

The previous formulation conflated the specific financial reporting of **manufactured housing Real Estate Investment Trusts (REITs)** with that of the home builders/manufacturers. It is indeed the major land-lease community REITs—such as **Equity LifeStyle Properties (ELS), Sun Communities (SUI), and Flagship Communities (MHC)**—that explicitly state in their investor disclosures and annual reports that high zoning barriers, supply constraints, and near-zero new community development function as protective moats that secure high occupancy, command rising lot rents, and drive up the asset value of their existing properties.

Furthermore, the quote from **Tim Larson**, President & CEO of **Champion Homes (SKY)**, solidifies this exact dynamic. His statement—*"We are growing with our community customers and are committed to supporting their mission and goals"*—demonstrates how the consolidating manufacturers align their strategic growth directly with their primary, highly capitalized community buyers and REITs, rather than pursuing aggressive preemption enforcement that would open up unrestricted retail land placement and disrupt the REITs' supply-constrained ecosystem.

Here is the revised multi-front **Facts-Evidence-Analysis (FEA)** model reflecting these corrected structural alignments.

#### **Table 1: The HUD/ICC/NIBS/MOD X Closed-Loop Ecosystem**

This table maps out the organizational and personnel interlocks forming a self-reinforcing circle funded by federal tax dollars.

| Structural Element                | Documented Fact Pattern                                                                                                                                                                                                                                                                              | FEA Objective Interpretation & Alignment                                                                                                                                                                                                |
|-----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
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| <b>Personnel Interlocks</b>       | <p>* <b>Dominic Sims:</b> Former ICC CEO; serves on the NIBS Board.</p> <p>* <b>John Hudgison:</b> Senior ICC Board Member; serves on the NIBS Board.</p> <p>* <b>Ryan Colker:</b> ICC VP of Innovation; appointed Chair of the NIBS Off-Site Construction Council while in his senior ICC role.</p> | <b>Ecosystem Overlap:</b> The boundaries between the federal advisory body (NIBS), the primary research authors (MOD X), and the dominant private code/certification provider (ICC) are structurally blurred through shared leadership. |
| <b>Competitive Omissions</b>      | Neither major HUD-funded report ( <i>Research Roadmap</i> or <i>Action Plan</i> ) mentions accredited ICC-ES competitors (e.g., IAPMO                                                                                                                                                                | <b>Market Lock-In Optics:</b> By focusing federal research recommendations exclusively on refining the proprietary ICC-ES process rather than including                                                                                 |

| Structural Element | Documented Fact Pattern                                                   | FEA Objective Interpretation & Alignment                                       |
|--------------------|---------------------------------------------------------------------------|--------------------------------------------------------------------------------|
|                    | UES, Intertek CCRR, PFS-TECO, RADCO) when evaluating compliance pathways. | established competitors, the reports align with a market-narrowing trajectory. |

 **Table 2: HUD Policy Contradictions & Foreword Critique**

This table contrasts the explicit policy goals outlined in HUD’s public messaging against its real-world regulatory actions.

| Policy Anchor                    | Public Documented Posture / Excerpts                                                                                                                                                           | Observed Administrative Contradiction (FEA)                                                                                                                                                                                                                                                                                                |
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| <b>Market Distortion Warning</b> | The <i>Action Plan</i> Foreword explicitly warns against <i>"federal overreach and actions, such as favoring one construction method over another, that could distort the private market."</i> | <b>Rhetorical Cover vs. Implementation:</b> The body of the report directly advocates for standardizing federal award criteria and implementing national housing system certifications that systematically favor sophisticated offsite players utilizing the ICC/MBI 1200/1205 standards over traditional HUD-Code independent parameters. |
| <b>Selective Approvals</b>       | HUD states its objective is to <i>"empower the private market to innovate and grow"</i> while protecting taxpayer resources and leveling the field.                                            | <b>Early Entrant Advantage:</b> HUD issued an Alternative Construction (AC) letter to CMH Manufacturing (a Clayton Homes subsidiary) in June 2026, approving chassis-free upper stories before public rulemaking comment periods closed. This represents the precise market distortion the text purports to oppose.                        |

| Policy Anchor                   | Public Documented Posture / Excerpts                                                                                                                                                                 | Observed Administrative Contradiction (FEA)                                                                                                                                                                                                                                              |
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| <b>Zoning Evidence Inaction</b> | HUD's own <b>2011 Regulatory Barriers report</b> established that HUD-Code homes placed in urban settings appreciate similarly to site-built homes, invalidating exclusionary zoning justifications. | <b>Performative Research Cycles:</b><br>Rather than utilizing its statutory authority under the <b>MHIA 2000</b> to enforce enhanced federal preemption against local zoning barriers, HUD continues to fund repetitive studies to "examine" barriers it documented over a decade prior. |

 **Table 3: The MHI Grant, REIT Protective Moats, and Manufacturer Alignment**

This table evaluates the alignment between MHI's public industry representation, its concrete legal actions, the business models of REITs, and the consolidation strategies of major builders.

| Assessment Category           | Documented Behavior & Evidence                                                                                                                                                                                                           | FEA Structural Reading                                                                                                                                                                                                                      |
|-------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>The Grant Anomaly</b>      | HUD Press Release 24-036 documents a <b>\$263,544.87</b> award to MHI to <i>"examine the impact of local barriers on the placement of manufactured homes."</i> The award is conspicuously absent from MHI's public promotional channels. | <b>Paid Gatekeeping Optics:</b><br>Accepting federal funds from the non-enforcing regulatory agency to study barriers that Congress already mandated HUD to override via the MHIA 2000 creates an inherent structural conflict of interest. |
| <b>The REIT Moat Strategy</b> | Residential REITs like <b>ELS, Sun, and Flagship</b> report to investors that high local zoning barriers and                                                                                                                             | <b>The True Beneficiaries of Zoning Barriers:</b> The restrictive regulatory environment is a financial asset for the                                                                                                                       |

| Assessment Category                     | Documented Behavior & Evidence                                                                                                                                                 | FEA Structural Reading                                                                                                                                                                                                                                                                                                                                                     |
|-----------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                         | restricted supply of land-lease communities protect their market positions, driving consistent rental growth and high occupancy.                                               | community operators/REITs, acting as a natural barrier to entry against new market competition.                                                                                                                                                                                                                                                                            |
| <b>Manufacturer-Community Symbiosis</b> | Champion Homes (SKY) President & CEO Tim Larson publicly stated: <i>"We are growing with our community customers and are committed to supporting their mission and goals."</i> | <b>Strategic Mutualism over Legal Enforcement:</b> Major manufacturers like Champion, Clayton, and Cavco benefit from consolidating market share. By aligning with their primary community buyers (REITs) rather than suing to enforce enhanced preemption, they protect the profitable, supply-restricted community ecosystem.                                            |
| <b>Chassis Modernization Optics</b>     | MHI and major builders heavily praised the <b>21st Century ROAD to Housing Act</b> for authorizing removable chassis/chassis-free systems (effective late 2025/2026).          | <b>Incremental Blending vs. Core Growth:</b> Prioritizing structural changes (like chassis removal under modular-blended codes) while leaving discriminatory zoning intact benefits massive consolidators capable of navigating complex local rules, while independent factories reliant on the cost-efficiency of the baseline HUD-Code standard face market foreclosure. |

- **The Symbiotic Circle:** The structural pattern indicates that "innovation" is being leveraged to erase the regulatory distinction of the HUD-Code manufactured home.
- **Divided Interests:** The manufacturing consolidators have no strong incentive to aggressively break local zoning barriers via litigation. Doing so would run counter to the "mission and goals" of their largest volume buyers—the land-lease community REITs (ELS, Sun, Flagship)—whose business models rely on the high-barrier, supply-constrained environment that those very zoning restrictions create.
- **The Capture Verdict:** Funding the primary trade association (MHI) that actively manages this landscape ensures institutional silence. The optics demonstrate regulatory capture in its textbook form: public taxpayer dollars are used to study barriers instead of removing them, preserving a consolidated, high-margin status quo for both REITs and giant builders at the expense of broader, affordable consumer homeownership.

To understand the core economics of how land-lease community operators and REITs leverage zoning limitations and land control, check out the video [The "Renting Dirt" Strategy: Why Investors Love Manufactured Housing Communities](#). This video breaks down the highly profitable "renting dirt" business model utilized by modern manufactured housing communities and explains why low supply and high barriers to entry make these land-lease portfolios incredibly lucrative for institutional investors.

[307: The "Renting Dirt" Strategy: Why Investors Love Manufactured Housing Communities - Nasir Ali](#)