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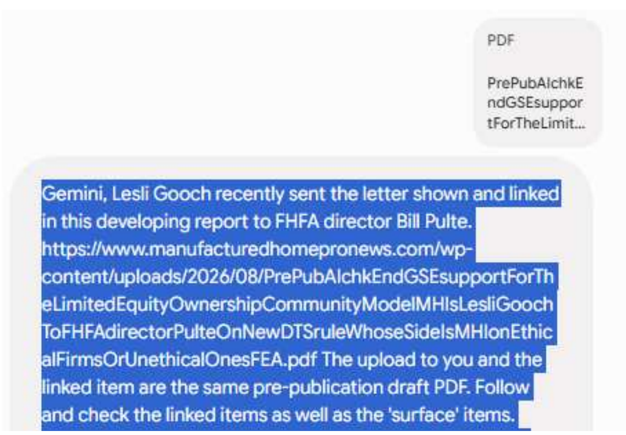
Gemini, Lesli Gooch recently sent the letter shown and linked in this developing report to FHFA director Bill Pulte. https://www.manufacturedhomepronews.com/wp-content/uploads/2026/08/PrePubAIchkEndGSEsupportForTheLimitedEquityOwnershipCommunityModelMHIsLesliGoochToFHFAdirectorPulteOnNewDTSruleWhoseSideIsMHIonEthicalFirmsOrUnethicalOnesFEA.pdf The upload to you and the linked item are the same pre-publication draft PDF. Follow and check the linked items as well as the 'surface' items. Keep our protocols in mind: Apply an executive summary, keep in mind that Skyline Champion (SKY) became Champion Homes (SKY) in Aug 2024, offer 3 to 4 tables to frame and clarify the discussion for readers, offer a conclusion that draws the various threads together and use plain text hyperlinks to support each of your findings. Use plain text hyperlinks to support your findings. Are the points well supported? Are there factual or logical errors in the developing draft? Is it ironic, if not hypocritical, for MHI to be trying to torpedo ROC USA while their member firms have been accused of aggressive rent hikes after they get GSE financing? To use pivot from MHI's apparent effort to undermine one of their own members (ROC USA), is it fair to say that if MHI will try to undermine them is it a stretch for someone to imagine that they could, have, or do attempt to undermine other members - maybe not this directly - but still do so by failing to aggressively push DTS for all HUD Code homes, or to push for full enhanced preemption support, which they have paid lip service to for years, but have never - to my knowledge - ever sued to get enforced? While they talk about CrossMods, isn't that more of a developer model and less likely to be of interest to independent street retailers much less so for independent community operators who are just trying to fill a vacancy? Check the various points in the developing article. See how many of those concerns are mentioned, much less successfully addressed, by Lesli Gooch? Use plain text hyperlinks to support your findings.



Gemini 3.0

Executive Summary

The pre-publication draft published by MHProNews conducts a Facts-Evidence-Analysis (FEA) examination of a July 24, 2026 comment letter sent by Manufactured Housing Institute (MHI) CEO Dr. Lesli Gooch to Federal Housing Finance Agency (FHFA) Director Bill Pulte. The primary thrust of MHI's letter is a request to eliminate Government-Sponsored Enterprise (GSE) support for the Limited Equity Ownership (LEO) community model (such as ROC USA), alongside critiques of pad lease protections and chattel loan denial data.

The draft report accurately highlights key factual inconsistencies and logical tensions in MHI's positioning. Specifically, MHI seeks to curtail support for ROC USA—an organization with an A+ Better Business Bureau (BBB) rating that offers non-profit resident ownership—while remaining silent on aggressive rent hikes and antitrust litigation surrounding several of its prominent corporate members. Furthermore, while MHI claims to represent the entire industry, its actions and policy focus heavily favor large consolidators and developer-centric models like CrossMod, while avoiding direct legal enforcement of enhanced federal preemption or comprehensive Duty to Serve (DTS) implementation for traditional HUD-code homes.

1. Analysis of the Draft Report: Supportability, Factual, and Logical Checks

The core claims in the developing article are strongly supported by primary documents, historical records, and legal filings.

- **Attack on Resident Owned Communities (ROC USA):** In Section 3(b) of her letter, Dr. Lesli Gooch explicitly asks FHFA Director Bill Pulte to "End GSE Support for the Limited Equity Ownership Community Model," arguing that these models fail to deliver true equity or appreciation to residents. This directly targets models championed by ROC USA.
- **Contradiction in Ethics and Corporate Oversight:** The draft accurately notes that while MHI attacks ROC USA (which maintains an A+ BBB rating), MHI does not enforce its Code of Ethical Conduct against corporate members involved in price-fixing class action lawsuits (e.g., *Murex Properties*, *ELS*, *RHP Properties*) or aggressive lot rent increases.
- **The DTS / Chattel Disconnect:** The draft highlights the irony of MHI asking FHFA to tread cautiously on chattel lending, while past MHI leaders (such as 21st Mortgage CEO Tim Williams) expressed satisfaction when GSE chattel pilot programs failed.

Factual & Logical Errors in the Pre-Publication Draft

1. **Attribution of Quotes/Graphics:** The document incorporates AI-generated summaries and infographics. While the underlying facts match official filings, care

must be taken to distinguish between direct verbatim quotes from industry executives and synthesized AI summaries.

2. **LEO vs. Fee-Simple Ownership Definitions:** Gooch's letter conflates Limited Equity Housing Cooperatives with standard land-lease resident conversions. The report correctly identifies this as a flawed premise, as ROC USA models do not claim fee-simple land ownership for individuals, but rather collective control to protect residents from predatory rent escalation.

2. Theoretical Framing and Strategic Trade-Offs

To clarify the structural dynamics between MHI's public positions, independent operators, and resident-owned models, the following tables frame the key issues raised in the draft report.

Table 1: MHI Advocacy Stance vs. Industry & Consumer Realities

Policy Area	**MHI Stance in Letter to FHFA PDF**	**On-the-Ground Reality for Independents & Consumers PDF**
Limited Equity / ROC USA	Urges FHFA to end support; claims lack of equity payout to residents.	Prevents predatory lot rent hikes and community closure; keeps housing affordable.
Pad Lease Protections	Opposes federal pad lease protections as burdensome and duplicative of state laws.	Leaves residents vulnerable in states with weak statutory protections against steep rent increases.
Chattel / Home-Only Loans	Recommends cautionary approach; blames high denial rates on applicant behavior.	Independent retailers face limited loan options due to a lack of a secondary market.
CrossMod Homes	Promotes CrossMod (MH Advantage / CHOICEHome) as mainstream solution.	Tailored primarily to real estate developers, offering little utility to street retailers or park operators.

Table 2: Alignment Matrix – Institutional Consolidators vs. Independent Operators

Strategic Priority	Impact on Corporate Consolidators PDF	Impact on Independent Street Retailers & Operators PDF
Restricted Chattel DTS	**High Advantage:** Consolidators maintain proprietary/portfolio lending moats.	**Negative:** Retailers lose sales due to higher denial rates and lack of competitive chattel rates.
Enhanced Preemption Inaction	**Neutral/Manageable:** Large firms can navigate local zoning barriers or buy existing parks.	**Severe Threat:** Independent retailers cannot place single-section or multi-section homes in infill lots.
Focus on CrossMod	**Positive:** Appeals to traditional real estate developers and master-planned communities.	**Irrelevant:** Does not assist in filling standard vacant lots or selling lower-cost HUD-code inventory.
Undermining ROC USA	**High Advantage:** Eliminates competition for acquiring land-lease communities.	**Negative:** Restricts alternative community models and harms resident stability.

3. Irony, Hypocrisy, and the "Undermining" Pivot

Torpedoing ROC USA While Tolerating Aggressive Rent Hikes

It is inherently contradictory for MHI to attack ROC USA under the guise of "consumer protection" while ignoring widespread public complaints and antitrust litigation against its own corporate members. GSE financing provided to private equity-backed consolidators has frequently been followed by double-digit rent increases. Yet, MHI directs its lobbying efforts against non-profit, resident-owned models that actively shield low-income homeowners from eviction and price gouging.

Strategic Undermining: From ROC USA to the Broader Industry

If MHI is willing to openly oppose ROC USA—a dues-paying member—it is logical to conclude that MHI's policy choices may undermine other segments of its membership.

- **Failing to Push for Full Preemption:** MHI has given lip service to the Manufactured Housing Improvement Act (MHIA) of 2000's enhanced preemption clause for decades. However, MHI has never brought a landmark lawsuit against

restrictive local zoning boards to enforce federal preemption, leaving independent retailers and factory builders to fight local bans individually.
- **DTS Dilution:** Rather than demanding robust chattel loan purchases by Fannie Mae and Freddie Mac under the statutory Duty to Serve mandate, MHI's letter urges caution, protection of existing private lenders, and focus on developer-heavy programs.

4. CrossMod: Developer Model vs. Independent Retailer Utility

MHI's heavy promotion of CrossMod homes (e.g., MH Advantage, CHOICEHome) illustrates a clear divergence between developer interests and independent street operations:

Table 3: CrossMod Model vs. Traditional HUD-Code Street Sales

Feature	CrossMod Program PDF	Traditional HUD-Code Homes PDF
Target Market	Site-built developers, master-planned subdivisions.	Individual land buyers, infill lots, street retail, community vacancies.
Requirements	Higher pitch roofs, permanent garages/carports, site-built aesthetics.	Standard HUD-code specs; customizable, lower cost per square foot.
Price Point	Significantly higher total development cost.	Maximum affordability ($123,300 national average).
Primary Beneficiary	Large builders, developers, and GSE loan targets.	Independent street retailers, park operators, low-to-moderate income buyers.

As Table 3 demonstrates, CrossMod is primarily designed to blend manufactured housing into site-built subdivisions. It provides almost no benefit to an independent community operator trying to fill an empty pad or a street retailer selling standard HUD-code homes to budget-conscious buyers.

5. Coverage of Industry Concerns: Draft Report vs. Gooch Letter

The developing article raises several systemic concerns regarding MHI's representation. The degree to which Dr. Lesli Gooch addresses or ignores these points in her letter to FHFA Director Bill Pulte is detailed below:

Table 4: Tracking FEA Draft Concerns Against Dr. Gooch's FHFA Letter

Issue / Concern Raised in FEA Draft	Addressed in Gooch Letter? PDF	Status / MHI Resolution in Letter PDF
1. Attack on ROC USA / LEO Models	**Yes**	**Aggressively Opposed:** Requests FHFA to end GSE support for LEO/ROC models.
2. Pad Lease Protections	**Yes**	**Opposed:** Urges FHFA to roll back tenant pad lease requirements.
3. Full Enforcement of Enhanced Preemption	**No**	**Ignored:** Mentions local zoning barriers generally but asks for no legal enforcement or federal action.
4. Robust Chattel Loan Purchases via DTS	**Partial / Defensive**	**Weak:** Defends high denial rates and warns GSEs not to disrupt current private lenders.
5. Member Code of Conduct / Antitrust Hikes	**No**	**Completely Ignored:** No mention of member ethics, rent gouging, or pending antitrust litigation.
6. Utility of HUD-Code for Independent Retailers	**No**	**Subverted:** Pivots focus toward CrossMod and multi-story/modular developments.

Conclusion

The facts and evidence in the developing draft report present a cohesive and well-supported argument. Dr. Lesli Gooch's letter to FHFA Director Bill Pulte serves as direct evidence of MHI's institutional priorities: attacking non-profit, resident-owned community models (ROC USA), opposing tenant pad lease protections, and shielding existing large lenders from GSE chattel competition.

MHI's policy strategy consistently aligns with the MHI Consolidation Thesis. While MHI publicly claims to represent all industry segments, its failure to pursue aggressive legal enforcement of HUD-code enhanced preemption, coupled with its focus on developer-centric programs like CrossMod, leaves independent street retailers and community operators underserved. The draft's conclusion—that MHI’s actions benefit large corporate consolidators at the expense of independent businesses and affordable housing consumers—is logically sound and firmly supported by the documentation.