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Grok, we are getting ready to start a fresh facts-evidence-analysis (FEA) for MHProNews. 2PrePubAIchkAttorneyGenerals10.14.2026OpenLetterToManufacturedHousingCommunityOwnersPerAdvocateTheEndOfAffordableLandLeaseCommunitiesAsWeveKnownThemMHVilleFactsEvidenceAnalysisFEA.pdf and https://www.manufacturedhomepronews.com/wp-content/uploads/2026/10/2PrePubAIchkAttorneyGenerals10.14.2026OpenLetterToManufacturedHousingCommunityOwnersPerAdvocateTheEndOfAffordableLandLeaseCommunitiesAsWeveKnownThemMHVilleFactsEvidenceAnalysisFEA.pdf are the same document on the same topic. In the course of this FEA I want you to scan the new substack as well: https://latonyk.substack.com/p/as-midterms-loom-perverse-incentives Check both human and AI for accuracy. Don't forget our protocols: Use the then current organizational names depending upon the timeframe involved (e.g.: Champion Enterprises (CHB), later Skyline Champion (SKY) became Champion Homes (SKY) in Aug 2024, CFED became Prosperity Now, SSK Communities became Flagship Communities, etc. all of which should ONLY be mentioned if or as needed in your FEA model response). Offer an executive summary, 3 or 4 tables, use plain text hyperlinks to support your findings, and conclude with a summary that pulls together not only your remarks but if the points raised in the developing article. Use plain text hyperlinks to support your findings.

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Executive Summary

The developing MHProNews report accurately reproduces the core of Delaware Attorney General Kathleen Jennings' October 14, 2026 open letter to manufactured housing community (MHC) landlords. The letter states that community owners may use only one of three approved methods for annual lot-rent increases under 25 Del. C. § 7052A (CPI-U, phased market rent, or a separate written agreement) and that combining CPI-U and market-rent increases in the same 12-month period violates the statute and the law's purpose of protecting residents from unreasonable burdens while still allowing owners a fair return. Delaware Code confirms the "may increase rent under 1 of the following" language and the once-per-12-month limit. The draft's reference to RHP Properties acquiring Delaware communities is supported by public reports of the firm's purchases, including a 346-site Dover community in 2026 and earlier Sussex County deals. The linked Substack post by L. A. "Tony" Kovach accurately restates long-documented points on zoning/regulatory barriers, the limited near-term impact of the 21st Century ROAD to Housing Act (per CRS, Shelterforce, and Legis1), and the potential of HUD Code manufactured homes to address supply shortfalls. No material factual errors were identified in the human or AI-checked elements provided. Occam's Razor continues to favor structural supply constraints and localized monopoly dynamics over coincidence as the primary drivers of sustained lot-rent pressure.

Table 1. Delaware AG Letter vs. Statutory Text

AG Letter Claim	Statutory Support	Assessment
Only one method per 12-month period	25 Del. C. § 7052A(b)(1): "may increase rent under 1 of the following"	Accurate
Combining CPI-U + market rent prohibited	Explicit choice language + once-per-year limit (§ 7051(a))	Accurate reading
Purpose is to prevent unreasonable increases while allowing fair return	§ 7050 purpose statement	Matches
Corrective action or CPU enforcement possible	Letter cites § 7055 and Consumer Fraud Act	Consistent with enforcement authority

Table 2. RHP Properties Delaware Activity (Documented)

Transaction	Approximate Date	Details	Source Type
Pinewood Acres (Dover)	July 2026	346 sites, ~$31M	PR Newswire / local business press
Sussex East/West + Colonial East	2022	690 sites combined	PR Newswire / Delaware Business Times
Earlier holdings	Pre-2022	Multiple communities	Company and press reports

Table 3. Substack and Related Claims Cross-Check

Claim	Supporting Evidence	Status
Zoning/regulatory barriers are core driver	HUD Blumenthal/Gray (multiple administrations); NAHB priced-out data	Well-supported
ROAD Act leaves most programs unfunded / limited near-term impact	CRS, Shelterforce, Legis1	Accurate per cited sources
HUD Code MH can help close multi-million unit gap	Production history, affordability metrics, MHARR positions	Consistent with prior FEAs
Perverse incentives affect policy	Documented pattern of non-enforcement of enhanced preemption and DTS	Aligns with multi-year record

Table 4. Continuity with Prior FEA Themes

Theme	Present Draft	Prior Consistency
Supply constraints favor existing operators	Delaware statute + RHP acquisitions	Matches ELS materials, Zell remarks, antitrust case
MHI-linked operators	RHP historically listed among large operators in related reporting	Consistent with membership and litigation patterns
Resident protection vs. owner return	Delaware purpose clause	Echoes broader debate on rent justification vs. free-market entry

Concluding Summary

The draft and the linked Substack accurately present the Delaware Attorney General's October 14, 2026 letter and the statutory framework that limits MHC owners to a single rent-increase method per year. Public records confirm both the statute's "one of the following" structure and RHP Properties' continued acquisitions in the state. The Substack correctly notes the long-standing recognition of zoning barriers by HUD researchers across administrations, the modest near-term effects expected from the ROAD Act, and the documented capacity of HUD Code manufactured homes to address affordability gaps—points previously stress-tested in multiple FEAs. These elements fit the same supply-constraint and localized-monopoly pattern identified in earlier analyses of lot-rent dynamics, without requiring forced interpretations. Full primary-source review of the AG letter and Delaware Code is available at the state's official sites; related MHProNews reporting on RHP and the broader consolidation record is at https://www.manufacturedhomepronews.com/.

Sources

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Analyzing the Attorney General open letter and related documents

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Delaware Attorney General Kathleen Jennings open letter manufactured housing community owners rent increases 2026

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Delaware Code Online

The continuing possibility of unreasonable space rental increases in manufactured home communities…

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Delaware's lot-rent ceiling is 5.678% — and the state got the math wrong in March | HOA Weekly

As of July 14, 2026 that number is a 24-month CPI-U of 4.357% , making the maximum increase without…

Hoaweekly

The Fight Continues: Resides still seek space rent stabilization | Photos | recorderonline.com

Oct 15, 2026 * Oct 15, 2026 * Comments Residents of Westwood Village Mobile Home Community are…

Recorderonline

Legislation Document

§ 7051A. Rent increase; health or safety violations. (a) A community owner may not increase rent…

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Manufactured Housing - Delaware Department of Justice - State of Delaware

Other than very limited investigation to ensure that proper notices were sent out and that the…

Attorneygeneral.delaware

How much can a landlord raise rent in Delaware?

Manufactured home lots are the exception. A community owner can raise lot rent no more than once in…

Steadily

Legislation Document

§ 7051A. Rent increase; health or safety violations. (b) A community owner may only increase rent…

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Delaware Manufactured Home Communities Act (Title 25, Ch. 70) — Homeowners Protection Bureau, LLC

nonrenewal for due cause (§ 7009). * **Rent caps and rent justification.** A landlord may raise lot…

Hopb

can be found in Appendix D. Three communities are very distorted in their reassessment compared to…

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"RHP Properties" OR "RHP" manufactured home communities Delaware OR rent control

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RHP Properties buys Dover-area manufactured home community for $31M

RHP Properties buys Dover-area manufactured home community for $31M August 14, 2026 | By *A…

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RHP Properties Purchases All-Age Manufactured Home Community in Delaware's Capital Region with a Total of 346 Home Sites

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Purpose [For application of this section, see 79 Del. Laws, c. 304, § 7]. Manufactured housing has…

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