

NOVEMBER 2017

MHR

MANUFACTURED HOUSING REVIEW

News and educational articles to help you run your business in the manufactured home industry.

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Time to Enforce the Law on
Federal Preemption

Does Your Advertising Meet Fair
Housing Standards?

Managing Difficult Tenants

Amazon, Tesla and Manufactured
Home Communities: A Treatise
on Reality Investing

... and much more!



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Publisher's Letter

By Kurt D. Kelley, J.D.
Publisher

It may be strange for many of us who've been in the Manufactured Housing Industry since the early 2000's, but now we are managing businesses in good times. The Dow is at record levels, GDP growth is over 3%, Unemployment is low, government regulations are decreasing, consumer confidence is as high as it's been since 2000, home manufacturers have lengthened delivery times, real estate prices are rising, and interest rates remain low. For most, these are times of prosperity.

As a business owner, managing a company in a healthy growing business environment requires special skills. Being able to see new and growing opportunities and act on them

requires vision and discernment. Knowing when to decline certain opportunities and easy funding does too. Hopefully the November issue of the Manufactured Housing Review will provide you with unique and valuable information to help you manage during these times of plenty.

Thank You!



Kurt D. Kelley, J.D.
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While a discussion of federal preemption may lead eyes to glaze-over in some quarters, a consistent and logical approach to preemption - that is fully consistent with the law as it exists today -- is vitally important to the manufactured housing industry and, even more so, to consumers of affordable housing. And having that discussion now, is crucial and, indeed, necessary, with a new Administration in the White House committed to regulatory reform, and the nomination of a new HUD General Counsel pending before the United States Senate.

Federal preemption - as MHARR has consistently stressed -- is one of the truly key elements of federal manufactured housing law. A preemption provision was thus included by Congress in the original Manufactured Housing Construction and Safety Standards Act of 1974. Later, that provision was significantly strengthened and expanded by Congress as part of the Manufactured Housing Improvement Act of 2000. The implementation of that provision, however, rests in the hands of the Executive Branch of the federal government- in this instance, HUD. And HUD, unfortunately- particularly during the four-year tenure of its current manufactured housing program administrator- has made an utter mess of what should (and, indeed, must) be robust and potent federal preemption that is clear and predictable for all federal program stakeholders. The good news, though, is that the current morass can be untangled and resolved in a way that complies with existing law, given proper leadership at the top of the federal program and within HUD's Office of General Counsel (OGC).

Federal preemption can occur in one of two ways. A federal law, adopted by Congress, can specifically state that it - and valid enactments pursuant to its authority - preempt state and local enactments within the same field. This is referred-to as "express" preemption. Alternatively, federal preemption can be inferred by a court when a federal enactment conflicts with parallel state and/or local enactments. This is referred-to as "implied" or "conflict preemption." In addition, preemption itself can be either complete or partial. In some cases, Congress will expressly occupy an entire field of activity or commerce. In others (and in most "implied preemption" cases), the preemption is more limited and must be analyzed and decided on a case-by-case basis.

For manufactured housing, federal preemption is express, not implied, insofar as the law (in section 604(d)), expressly

states that HUD enactments, pursuant to the Act's authority, are preemptive. The law, however - both as originally stated and as amended later by the 2000 reform law - does not fully preempt the entire field of manufactured housing construction, safety (and later installation) regulation. Instead the law states: "Whenever a federal manufactured home construction and safety standard established under this title is in effect, no state or political subdivision of a state [i.e., locality] shall have authority either to establish or to continue in effect ... any standard regarding construction or safety applicable to the same aspect of performance of such manufactured home which is not identical to the federal ... standard." (Emphasis added).

In the era before the 2000 reform law, the pivotal question, in each preemption situation, was whether the federal standard and the state or local standard in question, both addressed the "same aspect of performance" of the home. And HUD, to its credit, for more than a decade following the enactment of the law, construed the scope of federal preemption under the law and, more specifically, what did or did not constitute the "same aspect of performance" of a home, in a relatively broad manner. In a 1989 decision, for example, the then-director of the HUD manufactured housing program ruled that an Oklahoma City fire sprinkler ordinance for manufactured homes was preempted, stating: "If your municipal requirements include automatic fire sprinkler systems, they address the same aspect of performance as HUD's standards, i.e., fire safety. Therefore, HUD's standards preempt." (Emphasis added).

During the 1990's, however - and still prior to the enactment of the major preemption changes contained in the 2000 reform law (as shown below) -- HUD OGC radically shifted course on federal preemption as revealed in legal memoranda obtained by MHARR under the Freedom of Information Act (FOIA). In those memoranda, OGC argued that the law's "same aspect of performance" language should be construed in a narrow and restrictive fashion based on court decisions interpreting similar language contained in the National Traffic and Motor Vehicle Safety Act of 1966 (NTMVSA) (i.e., *Chrysler Corp. v. Tofany* and *Chrysler Corp. v. Rhodes*). This shift, based on an extremely narrow construction of the "same aspect of performance" proviso, led to a series of HUD decisions (never since retracted), holding that state and/or local fire sprinkler mandates are not federally preempted because the federal "fire safety" standards for manufactured homes involve passive

measures, such as “reducing fire hazards” and “providing measures for early detection,” rather than “mechanical devices ... [to] retard the spread of fire in a home.”

While MHARR vehemently disagreed with these decisions (and still does), this narrow view of federal preemption should have changed completely in the wake of the preemption amendments contained in the Manufactured Housing Improvement Act of 2000. Among other things, that law added a new sentence to the original preemption provision, stating: “Federal preemption under this subsection shall be broadly and liberally construed to ensure that disparate state or local requirements or standards do not affect the uniformity and comprehensiveness of the [federal] standards promulgated under this section nor the federal superintendence of the manufactured housing industry....” (Emphasis added).

With this statutory amendment, Congress made two key changes to federal preemption. First, it legislatively overruled - with express, unequivocal and unmistakable language - HUD OGC’s determination that the scope of federal preemption should be construed narrowly. Second - and, again, directly contrary to HUD’s narrow approach to preemption -- it explicitly expanded the scope of that preemption. Thus, while HUD had previously ruled that the federal standards could only preempt state or local construction or safety standards, the 2000 reform law expressly expanded the reach of federal preemption to also include state or local “requirements” that interfere with federal “superintendence” of the industry and, by natural extension, to the accomplishment of the federal law’s purposes, including expanding the availability and affordability of manufactured housing (think placement restrictions).

So, what did HUD do with all this, post-2000 law? Initially, it twisted itself into intellectual knots trying to pretend that the 2000 law actually changed nothing regarding preemption. In discredited “guidance” regarding then-“Recent Program Activity,” HUD stated: “Does the 2000 Act expand the scope of federal preemption? No, though revised language in section 604(d) does require that the original preemption provision be ‘broadly and liberally construed,’ HUD does in fact take a broad and liberal view with regard to preemption of state and local standards when they actually conflict with HUD ‘s Manufactured Home Construction and Safety Standards.” (Emphasis added).

HUD’s assertion that it was already taking a “broad and liberal view” of preemption under the Rhodes and Tofany cases, before the 2000 reform law, is laughable. The courts in both of those cases concluded that the “same aspect of performance” language in the NTMVSA statute should be construed narrowly. The Tofany court, in fact, stated: “we conclude that the ‘aspect of performance’ language in the preemption section of the Act must be construed narrowly.” (Emphasis added). For HUD to claim, then, that before the 2000 law it was already construing preemption “broadly,” under cases which specifically state that preemption is to be construed “narrowly,” is absurd.

The fact of the matter, as founding MHARR President Danny Ghorbani stated in the September 2014 edition of the “MHARR Viewpoint,” is that: “When Congress passed the 2000 reform law, it was well aware of HUD’s microscopic approach to federal preemption and [fire] sprinkler preemption in particular. Thus, the ‘broad and liberal’ provision of the 2000 reform law directly overruled HUD’s unduly narrow pre-2000 interpretation of federal preemption.” (Emphasis in original). Further, for HUD to claim, without any basis whatsoever, that the 2000 law did not expand the scope of preemption under the law - when Congress specifically added “requirements” (and not just construction and safety “standards”) to the type of state or local enactments that could be preempted (and note how the word “requirements” is conveniently omitted from the language quoted in HUD’s “guidance” document) -- is again, a misrepresentation of the 2000 reform law. Which makes it all the more incredulous and indefensible that HUD, for over two decades now, has left on the books “Statements of Staff Guidance” regarding federal preemption, adopted before the 2000 reform law, that fail, in any way, to reflect the changes made to federal preemption by Congress.

For more than a decade after the enactment of the 2000 reform law, then, HUD maintained the utterly absurd and unsupportable fiction that the 2000 law did not make any real change to federal preemption and that, as a result, it did not need to change its administrative approach to preemption. This position not only conflicts with the plain meaning and legislative history of the changes made in the 2000 law, but has resulted in significant harm to both the HUD Code industry and the lower and moderate-income American families who depend on manufactured housing as the nation’s premier source of affordable, non-subsidized home-ownership. By continuing an unduly narrow approach to federal preemption,

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HUD has allowed localities to use alleged “standards” and various other types of mandates, including supposed “zoning” ordinances and requirements, to effectively exclude and discriminate against the industry, its products and, most importantly, the Americans who seek to purchase and own a manufactured home of their own.

That is, until now - maybe. In two unpublished and largely unpublicized decisions, HUD OGC has actually backed into a construction of federal preemption that is generally consistent with the language and original intent of the law. In one case, HUD OGC preempted an effort by the State of Minnesota to require an onsite “Blower Door Test” -- pursuant to the International Energy Conservation Code (IECC) -- for all new residential construction, including manufactured homes. In a July 10, 2014 decision, issued by email to Minnesota state authorities, OGC recites both the preemption provision as amended by the Manufactured Housing Improvement Act of 2000 -- with its mandate that preemption be “broadly and liberally” construed -- and the preemption provision of the HUD Procedural and Enforcement Regulations (PER) at 24 C.F.R. 3282.11. It then goes on to state: “The Blower Door Test is essentially a standard requiring remedial actions above and beyond what is required by the federal standards.... Thus, the Act and... 3282.11(b) and (c) preempt Minnesota’s enforcement of the IECC standard.”

(Emphasis added). HUD also rejected the state’s argument that the “Blower Door Test” was an “installation” standard and thus not subject to federal preemption under HUD’s re-codification of the federal installation standards.

What stands out about this decision, is - finally -- the “broad and liberal” nature of its preemption analysis. Unlike past HUD preemption decisions which, as noted above, had focused almost exclusively on whether a state or local standard addressed the “same aspect” of manufactured home “performance” as a federal standard, the blower door decision does not even attempt to identify a federal standard addressing the “same aspect of performance” as the proposed state regulation. Instead, it simply finds -- as expected by Congress when it enacted the enhanced preemption of the 2000 reform law - that the state standard requires action “above and beyond what is required” by the “federal standards,” collectively and viewed as a whole. In doing so, it rejected the state’s argument that “when [the] federal standards are silent or do not address a specific code or standard ... the state is not superseding the Federal Standard and may enforce state standards.”

Until recently, this unheralded and unpublished HUD decision has stood by itself, as a sort of “outlier” among various



administrative rulings regarding federal preemption affecting manufactured housing regulation. That is, until HUD OGC issued an opinion in 2017 regarding federal preemption of local installation standards in federally-administered "default" states. That opinion -- initially posted on the website of HUD's installation contractor, but now apparently "scrubbed" after being highlighted by MHARR -- would completely reverse HUD's previous rulings concerning the preemptive effect of its federal "model" installation standards.

As MHARR has explained in detail previously, the National Commission on Manufactured Housing, in proposing HUD regulation of manufactured home installation in "default" states, expected that the federal installation standards would be codified as part of the Part 3280 construction and safety standards and would, therefore, be fully preemptive, subject to an express exception for state installation programs. Instead, though, HUD -- in an action vigorously opposed by MHARR but accepted by MHI -- "re-codified" the federal installation standards as a separate Part 3285, and has claimed, for nearly a decade now, that those standards, as a result, are not preemptive at all. Thus, the previously-referenced HUD "guidance" document states: "Does federal preemption apply to the Model Manufactured Home Installation Standards mandated by the 2000 Act? No." (Emphasis added).

Now, though, after ten years of denying any preemptive effect for its federal installation standards - which has harmed the industry and consumers by allowing the continuation and enforcement of purported local "installation" standards that are, in actuality, discriminatory and exclusionary subterfuges - HUD, incident to a new effort to impose the federal "model" installation standards on states with approved state-law installation programs, has suddenly decided that the federal installation standards are preemptive.

That 2017 OGC opinion- again, now apparently deleted from the installation contractor's website after being exposed by MHARR-- simply sweeps away (and/or ignores) the legal niceties that had previously been asserted by HUD in maintaining that federal installation standards are not preemptive, as well as the previous narrow construction of that preemption outlined above. Thus, the 2017 OGC opinion states: "The [federal] installation regulations do not specifically contain language that addresses whether a local ... jurisdiction can issue permits or certificates of occupancy to an unlicensed installer. However, under federal law, the Department is

given exclusive authority to regulate manufactured home construction and safety standards, which include installation standards, and in such areas, the Department's regulations are given supremacy over State and local laws and requirements through the Manufactured Home Construction and Safety Standards Act." (Emphasis added). This broad and sweeping declaration is directly contrary to all previous statements by HUD with respect to installation standards.

So, what, then, is the state of federal manufactured housing preemption as amended by the 2000 reform law? The only accurate answer at this juncture, is "confused and chaotic," with old, outdated and incorrect pre-2000 law "guidance" still on the books, state installation programs being pressured and threatened to submit to HUD demands based on supposedly non-preemptive federal installation standards, and new, more accurate preemption decisions being "deep-sixed" by a program leadership that seems intent on minimizing preemption when it could help the industry and consumers, and adhering to the original intent of the law only when it can be used to expand federal authority, again to the detriment of the industry, consumers, and state authorities.

MHARR has been a consistent advocate for broad and effective preemption regarding construction and safety standards, where uniform standards and enforcement are the key to affordability. On installation, MHARR has again been consistent with the express language of the 2000 reform law in seeking flexibility for the states and their state law installation programs, which must address varying conditions and circumstances that cannot be properly or cost-effectively regulated by HUD, on a one-size-fits-all basis, from Washington, D.C. At the same time, MHARR has long advocated the preemption of local mandates - whether characterized as construction standards, installation standards, placement mandates or anything else -- which effectively are, and function as, a subterfuge for excluding or otherwise discriminating against manufactured housing.

Installation and placement, however, are primarily a post-production matter, and the industry, as well as consumers, have suffered because of the lack of an independent national post production association that could partner with MHARR in tackling this issue in all of its various forms -- pressing for a resolution that would be consistent with the law as it stands today, while benefiting millions of homebuyers around the United States. This is in addition to a myriad of other

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abuses being imposed on the industry's post-production sector from Washington, D.C. in the absence of such an independent national post-production association. These major issues include, but are not limited to: debilitating SAFE Act mandates; Dodd-Frank mandates; FHA Title I mandates; the continuing refusal to securitize manufactured home chattel loans on a market significant basis; baseless, high-cost proposed "energy" standards; baseless restrictions on attached garages; needless on-site construction mandates and restrictions; baseless new requirements for "frost-free" foundations; and HUD's attempted takeover of installation regulation in "approved" states, to name just a few. While MHARR, as a producers' association, was drawn into the drafting and passage of the Housing and Economic Recovery Act of 2008 (HERA) due to failures of the broader industry -- it has and will continue to aggressively address all of these matters. Ultimately, though, the industry's post-production sector will realize that these battles will only multiply without an independent, nation association of its own.



Mark Weiss



MHARR is a Washington, D.C.-based national trade association representing the views and interests of independent producers of federally-regulated manufactured housing.

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Mark Weiss is the President and CEO of the Manufactured Housing Association for Regulatory Reform (MHARR) in Washington, D.C. He has served in that position since January 2015 and, prior to that, served as MHARR's Senior Vice President and General Counsel.

MHARR is a national trade organization representing the view and interests of producers of HUD Code manufactured housing. Its members are mostly smaller and mid-sized manufacturers from around the country. Founded in 1985, MHARR is dedicated to fighting excessive and unnecessary regulation, to protecting, defending and advancing manufactured housing in accordance with federal law, and to preserving the affordability and availability of manufactured housing.

An honors graduate of Rutgers University with a degree in Political Science, Mr. Weiss received his Juris Doctor degree from the

All of that said, the time has come for a thorough and honest reassessment of the state of federal preemption under the 2000 law, in order to make it consistent, logical and predictable, to preserve legitimate state authority as provided by the 2000 reform law, and to accomplish the laudable and necessary goals of that legislation. The Executive Order 13777 regulatory review process mandated by the Trump Administration and currently underway at HUD provides a mechanism for that review and MHARR has called for HUD to do just that. In order to accomplish any real change, though, new leadership - as MHARR has publicly advocated - will be necessary at the top of the federal program. Under its present administrator, the program seems to simply gravitate to whatever will hurt the industry (and its consumers) the most. This situation, in all of its various iterations, is unacceptable and demands fundamental change.

George Washington University School of Law in Washington, D.C. in 1983 and began working on manufactured housing regulatory issues almost immediately as an attorney for the firm of Casey, Scott & Canfield, P.C. -- then General Counsel for the Manufactured Housing Institute (MHI), and later General Counsel for MHARR. Mr. Weiss later became General Counsel for MHARR in his own right and, in 2006, was named as MHARR's Senior Vice President.

During his career with MHARR, Mr. Weiss has been involved in formulating and supporting MHARR policies with respect to nearly every aspect of the federal regulation of the manufactured housing industry. He played a direct role in the development and passage of the Manufactured Housing Improvement Act of 2000 and has worked to advance the views and interests of the industry's smaller businesses before Congress, HUD, the federal Manufactured Housing Consensus Committee (MHCC) and other government agencies, boards and committees. In recent years, moreover, given the increasing difficulties of the industry's post-production sector (including retailers, communities and finance companies), Mr. Weiss and MHARR have become progressively more involved with advancing the regulatory perspective and interests of this important segment of the industry as well. Most recently, Mr. Weiss served as a member of the U.S. Department of Energy (DOE) Working Group on manufactured housing energy conservation standards, voting against those proposed standards -- and leading the industry effort to roll-back those proposals -- that would significantly and needlessly increase the cost of manufactured homes for American homebuyers.



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Why I Am Done Talking to the Media

By Frank Rolfe

I did my final interview recently, with an Italian public service television station. It's a story on affordable housing in the U.S. and the potential that Italy is wasting by letting their manufactured home communities (yes, they have them) become the bastion of "gypsies" rather than offering safe, clean housing for the general public. The reporter explained to me that the manufactured home we toured in our property in Fenton, Missouri would cost \$300,000 in Italy – that's how screwed up their housing market is. The program should come out in a few months. But what they didn't realize is that I'm finished with talking to the media. And I'm handing off the ball to new volunteers – do you want to be one of them?

I'm tired of the same old spins

Every media group you talk to has the same basic premise: that all manufactured home community owners are evil and spend all their time trying to take advantage of their poor downtrodden residents. Let's take that statement apart and analyze each section. I know of virtually no manufactured home community owners that are evil. The very few properties in our sector that might appear to be the result of a "slumlord" are typically the actual result of an older owner with health issues. Anyone who has had the privilege to spend time at any industry event knows that there is no nicer group in real estate than the community owners. As for taking advantage, that's ludicrous. We are the only form of non-subsidized affordable housing. We do what the government can't, and what apartment owners won't. And finally, as to the concept that all community residents are downtrodden, the truth is that the majority of community residents are gainfully employed, prosperous and take offense at such a statement. So the truth is that the standard media position is 100% incorrect. It does not matter what you do as a community owner – even if you gave every resident free rent and a \$1,000 gift card to Walmart – the media would spin that as some form of a "trap" or ask why you had not given them more.

Smart people have already figured it out

The first interview I ever did was with Gary Rivlin, a reporter for the New York Times. I met with him because I hoped that I could persuade him that the typical media spin was incorrect. To prove my point, I let him live in one of our properties for a week. He then wrote an article that praised our product and declared that we "are the best thing going at a time in which the nation's need for low-cost places to live has never been greater". That was followed by Bloomberg and the Wall Street Journal. Even Time magazine gave praise to our industry by declaring that we are the "gated communities of the less affluent" (which is not really fair because many of our communities contain the affluent, too). But the bottom line is that all smart media groups have come to realize that we offer a great product at a great price. So the only

ones that are still calling are those who either refuse to accept the truth, or are trying to create inaccurate stories and headlines just to sell copies. And that's a waste of my time.

Even I am getting tired of hearing myself

I have been talking to reporters for what is nearing a decade. Virtually every story about the industry includes me. I've been on stories in Europe. I've been called the "Mensch of the Week" (that's a good thing). I've been on National Geographic. And, while those were all interesting experiences, the fact of the matter is that the world must be getting bored with hearing me over and over. I'm not Brad Pitt, and I'm not Jerry Seinfeld, I'm just a guy that owns and operates manufactured home communities – not an entertainer. Surely there are others who could make things a little more interesting.

And that's where you come in

Those early media appearances came as the result of nobody wanting to talk to reporters writing stories or stations trying to fill air time. I was the early pioneer in actually educating people on what we do. Some wrote what I said accurately, and others twisted it to meet their selfish purposes. But they would not have all been calling me if they had other outlets to gathering quotes and data. So I'm hoping that others will take up the mantle and start talking more to those outside the industry. Tell them of the great living environments we provide. Explain how we provide home ownership to millions of people who would be unable to achieve it without us. Don't be afraid to take chances as the potential positive impact outweighs the negative. There are roughly 44,000 manufactured home communities in the U.S. – that's a virtual army of owners who can provide a narrative that can convince others of how important our work is.

Conclusion

It's been a great run talking to reporters. I would do it all again. But going forward, I'm ready to let others participate. Would you help be a part of the information solution? Together we can end the ignorance on what a manufactured home community is and why it's the solution and not the problem.



Frank Rolfe has been a manufactured home community owner for almost two decades, and currently ranks as part of the 5th largest community owner in the United States, with more than 23,000 lots in 28 states in the Great Plains and Midwest. His books and courses on community acquisitions and management are the top-selling ones in the industry. To learn more about Frank's views on the manufactured home community industry visit www.MobileHomeUniversity.com.

Does Your Advertising Meet Fair Housing Standards?

By Rick Robinson

Title VIII of the Civil Rights Act of 1968 makes it illegal to discriminate in any type of housing based upon race, color, religion, sex, national origin, disability or familial status--the "protected classes."

And while most understand how that law applies to people walking into a rental office or sales center, it also applies to advertising.

The Fair Housing act specifically provides that it is illegal to advertise for the rental or sale of any housing in a way that might indicate discrimination against a protected class.

For instance, an advertisement which states "No Children" would be an example of an advertisement that violates the familial status prohibitions in the Fair Housing Act.

However, advertisements held in violation are not always that black-and-white. Advertising that a community is "perfect for mature professionals" might also be deemed to be in violation.

These principles apply to all advertising. So, whether it's traditional advertising like television, radio or newspapers, or non-traditional advertising like on-line bulletin board services, ads must comply with Fair Housing standards.

However, while the Fair Housing Act prohibits ads that show discrimination against protected classes, there is nothing in the law that prohibits advertising to attract protected classes as residents. Thus, an advertisement stating a property has a "family playground" or a "handicapped accessible clubhouse" is perfectly acceptable.

BEST ADVERTISING PRACTICES

- 1) Advertise the virtues of the property itself instead of the types of tenants desired.
- 2) include the Fair Housing logo in all advertising, including listings with on-line services, such as Craig's List.



Rick Robinson is General Counsel and Senior Vice President for State and Local Affairs at the Manufactured Housing Institute (MHI), the only national trade organization representing all segments of the factory-built housing industry. To receive a free copy of the Manufactured Housing Institute's monthly Fair Housing Update, please send your name and email address to MHI's General Counsel/Sr. VP for State and Local Affairs, Rick Robinson at rrobinson@mfghome.org.



One of the most worrisome aspects of owning rental properties is dealing with difficult tenants. The news is ripe with stories of well-intentioned landlords being mercilessly sued by jackpot seeking tenants. So, in order to keep you out of the courthouse, here are some management ideas on how to deal with problem tenants.

Remember when your Mom told you that you couldn't be in the band? It was just too much of a time commitment. So, of course, you joined immediately. Only later did you find out that your Mom badly wanted for you to learn to read music and play an instrument. She'd simply played you like a fiddle. Sometimes, psychology works better than a power play.

Regular, consistent and accurate communication saves a lot of trouble too. It's not unusual that a tenant's problem escalated because they could not get in touch with a manager. Poor customer service is what really escalated a once easily solvable issue. And if you have a difficult problem that can't be solved over the phone, meet in person. Only about 25% of communication is through words alone. The tone and delivery of a message are the other 75%. Simply taking the meeting is often enough to placate an upset tenant and show you care.

Require that your managers read or know the teachings of "How to Win Friends and Influence People." It's the best book on communicating with humans I've ever read. Dale Carnegie says to start conversations with what you do agree on, avoid name calling and counter-productive emotion, and then center in on the specific point of dispute.

Follow up meetings with a written action plans. Spell out the agreements made by both parties. This helps avoid future disputes. Memories of meetings are clouded by emotions and human errors. A written document will help solve those concerns particularly if your written plan spells out what and when you will do something, and the tenant's promises and obligations too. And if you make a promise in writing, fulfill it as promised or be prepared to explain exactly why you couldn't with your hat in your hand.

Possibly the best way to limit tenant problems is to start with a well drafted rental agreement and set of park rules. Make sure your Lease clearly addresses the rules most likely to cause contention. For example, it should address parking rules/rights, pet ownership rules, outside cooking, kiddie swimming pools, and trampolines (none). And if there is anything peculiar about your property, address that too.

When it comes to enforcing park rules, be clear and consistent. If you bend the rules for one tenant, you are asking for a headache from other tenants. And remember, every time you enforce a park rule, you may be upsetting one tenant, but you are likely making every other tenant in your park happy. The tenants you want are looking to live in clean, safe, quiet communities.

If you have a smaller rental operation that does not have full time maintenance personnel, then you should have your trade and repair contractor's information handy and on speed dial. This list should include a handy man, plumber, electrician, and a carpenter. Tenants generally don't expect miracles and they will generally be content with both recognition and a response. If you don't know who your contractors will be, do your research before you get the maintenance call. Prompt payment of contractors will help assure they are readily available for you in the future, too.

For those times when you've tried to appease a tenant without success, then consider having your attorney send them a letter. This sends the message you know the law and you are serious. Including in this letter what steps the tenant should expect next if they don't comply is smart business. Reciting exact law and landlord-tenant statutes helps, too. This reflects you are the one in compliance with the law. You can even offer to have a third-party act as a mediator as another option short of an expensive and time-consuming courthouse visit.

Due the aggressive advertising practices of personal injury attorneys on television and billboards, some tenants have plaintiff lawyers phone numbers handy. In the event you are contacted by a tenant's lawyer, listen to what they have to say and then politely advise you'd be glad to visit with them, however your insurance requires you to forward their complaint to your insurance carrier. Knowing what insurance coverages you have, and don't have, is good business. Given the amount of tenant discrimination claims today, having tenant discrimination coverage is usually a good investment. If a tenant claim or loss is covered under your insurance policy, your insurance carrier will be there to pay expensive legal bills and pay any ultimate settlement or judgment.

Waylon is a Partner with Sunstone Manufactured Housing Consultants, www.SunstoneMHC.com a National Real Estate Brokerage with primary offices in both Chicago, Dallas and Houston. Sunstone specializes in Manufactured Housing Communities and also manages properties for its MHC owning clients.



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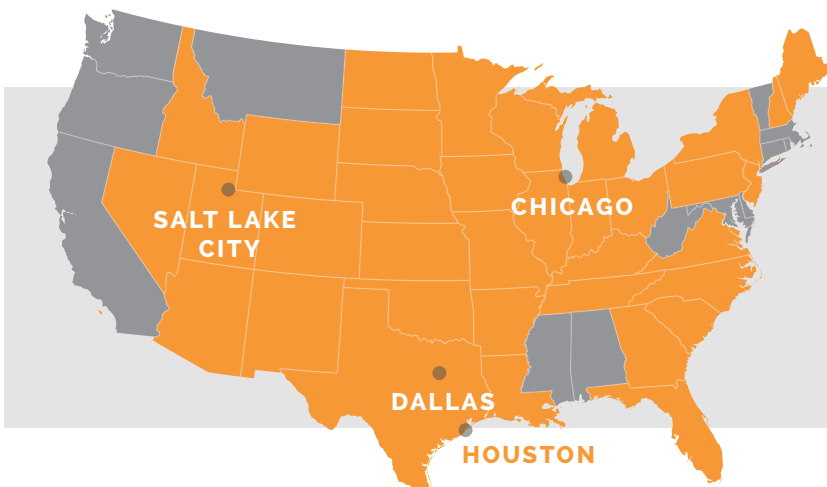
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Why Your Employees' Driving Record Can Be a Reflection on Your Company

By Bill McCloy



You've seen it before - a good employee makes a horrible decision in his or her personal vehicle. What are the implications for your company if the employee's license is revoked, canceled, or suspended due to alcohol, controlled substance or felony violations?

If the employee in question is a CDL driver, he or she will lose driving privileges for one year. But what if he or she doesn't hold a CDL, but instead drives a sales car or pick-up truck? What if the incident involves excessive speed, reckless driving or bodily harm? What happens then?

As an employer, you are caught in the balance between a good employee and the potential for vicarious liability, which holds you responsible for the actions or omissions of another person - in this instance, your employees. As a result, you need to understand the "Doctrine of Negligent Entrustment" and the potential impact that your employees' decisions can have on your business.

In its general form, the Doctrine of Negligent Entrustment states:

"It is negligent to permit a third person to use a thing or to engage in an activity which is under the control of actor, if the actor knows or should know that such a person intends or is likely to use the thing or to conduct himself in the activity in such a manner as to create an unreasonable risk or harm to others."¹

The legal interpretation of the principle of "negligent entrustment" is not founded upon negligence of the driver of an automobile, but upon the primary negligence of the entruster in supplying an automobile to an incompetent driver. In other words, the employer knew or should have known of the employee's incompetence, but in spite of this knowledge, the employer entrusted the vehicle to the driver in the scope of his work. The employer may therefore be guilty of negligent entrustment.

Why Your Employees' Driving Record Can Be a Reflection on Your Company cont.

What can you do to protect your company?

It is important to be proactive in managing your drivers, both as part of your fleet safety program and to effectively maintain your CDL files. Below are some helpful tips for making this process easier and more efficient:

1. Develop a company policy for MVR evaluations (CDL & all other drivers) that must be signed by the employee. A minimum three-year evaluation period is effective.
2. Evaluate MVR at time of hire and annually thereafter (using a minimum time standard).
3. Establish guidelines for reporting major violations (such as DUI, reckless driving, chargeable accidents) immediately, regardless of whether the incident occurs in a personal or company vehicle.
4. Develop a company policy for personal use of company vehicles that must be signed by the employee.
5. Develop a company policy for "occasional" drivers (for example, office employees who may drive to the bank or post office during the course of their work.)
6. Develop a company policy for employees who may use their personal vehicles for company business (for example, outside sales people). Establish minimum limits that they must carry.
7. Provide driver training programs.

In addition to the above suggestions, other options may exist for managing an employee with a history of driving infractions, including placing that individual in a non-driving role. However, doing so may affect other roles and responsibilities within your organization.

As an employer, it is important to remember that the consequences of allowing an employee with a less-than-perfect driving record extend beyond a possible traffic violation or accident. Due to the Doctrine of Negligent Entrustment, an employer must be aware of the potential liability to his or her company from allowing an employee with a poor driving history to operate any motor vehicles for work purposes.

This article was authored by Bill McCloy, Managing Director and Underwriter with AmWINS Program Underwriters

1 Prosser, W. L. & Wade, J. W. (1965) Restatement of the Law Second, Torts. Philadelphia, PA: American Law Institute

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GenX in the C-Suite: How this Once-Overlooked Generation is Making a Move for the Top

By Stefanie Neer

One leadership group that is poised to jump to the forefront as the Baby Boomer generation retires is Generation X. Born between 1965 and 1980, this once-ignored and underappreciated generation has slowly emerged to take over the C-suite. With multi-generational teams making up today's workforce, inevitable conflicts occur over issues such as management and operational styles, technology use and overall decision-making. Can Generation X provide the leadership qualities to merge the generations? And what are some of the most influential qualities that Gen X leaders possess that can help take our organizations successfully into the next decade?

X Marks the Spot:

The power of Generation X lies in its good blend of traditional Boomer values and the technological savvy and entrepreneurial bent of the Millennial generation. As the economy continues to evolve and grow – globally and technologically -- GenX can help companies evolve with fresh ideas and perspectives. The GenX employee has lived with less wealth than their Boomer parents, yet has developed a healthy balance of saving and spending, making them masters at doing more with less. GenX is used to working in flatter organizations with fewer middle-management positions, as opposed to the hierarchical structure of the Boomer generation. Thus, they are used to doing more with less, remaining agile and nimble in their quest to improve efficiencies and produce cost savings within the organization. Despite their frugality, GenXers have enormous spending power and tremendous influence in the world economy. According to the US Department of Labor, Gen X currently spends more money per household than any other generation.

Generation X workers are very educated, with more than 35% of them having college degrees. They are also great innovators and entrepreneurs. Successful GenX entrepreneurs include Elon Musk, founder of PayPal®, Tesla Motors® and SpaceX®; Michael Dell of Dell Computer®; Sara Blakely of Spanx®, and Jack Dorsey of Twitter®. Most GenX entrepreneurs were entering their careers about the time of the dot-com boom and bust of the 1990s, so they possess the innovative spirit of the new Millennials with the practical and traditional values of the Boomer generation. Many World-class brands such as Microsoft® and Yahoo® have begun placing Gen X employees in leadership positions, recognizing the value they bring to the boardroom. In preparing for the inevitable exit of the

Boomer generation in the workforce, Generation X leaders will emerge and take over the helm successfully, while providing the mentorship opportunities for Millennials to continue to grow and emerge behind them.

Closing the Digital Divide

One of the biggest benefits and influences of Generation X is their ability to bridge the digital gap within the new, multi-generational workforce. They're technologically savvy, like Millennial digital natives, but they can engage and reach out to communicate effectively in person as well, like their previous Boomer generation. Because of this, they are great influencers and mentors to both the older and younger generations, making them great leaders for today's modern companies. Their management style combines relationship-driven methods with automated digital communication to balance the needs of all generation of workers, while using technology to work smarter, not harder.

Can Generation X Leaders Succeed?

The effectiveness of Generation X in the C-suite depends on their ability to manage several crucial factors, including how to:

- Navigate growing cultural and generational divides
- Adapt to increased globalization and competition
- Utilize new technology to communicate, automate and streamline business

As agencies look to transition leadership to the new generation, they must embrace these changes occurring in the marketplace and in the technological world.



A New Way of Marketing:

As consumer habits and the new economy continues to evolve, companies must develop innovative ways of marketing to customers, particularly when it comes to reaching the new tech-savvy Millennial and post-Millennial Generation Z spenders of the future. Generation X leaders can provide new perspectives on how to initiate marketing programs that reach these new audiences, incorporating digital, mobile and social media into the traditional marketing mix.

The rise of the Gen X leader will eventually occur, so companies should begin to prioritize the development and nurturing of these future Leaders to ensure that their companies grow and evolve in the new economy.

Stefanie Neer

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A Smooth Transfer of Power:

Companies looking to trust executive leadership to a Generation X employee should start by creating a long-term vision and strategy for the succession planning process. They should start by identifying any potential candidates internally, and then evaluating their skills and qualifications for leadership. Following the identification process, they can put training and development programs in place to groom future leaders for taking over the C-suite. Finally, companies should start giving Gen X leaders the opportunity to manage others, take on important projects, get involved in community efforts, and gain visibility in an executive role. Ongoing mentorship with potential GenX leaders will help boost confidence and help them feel comfortable taking over the role when the timing is right.



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Nine-Woman Board Leads 430-Home Manufactured Home Community in Record-Breaking Neighborhood Purchase

By Mike Bullard

Halifax, Mass. – Homeowners in Halifax Estates Mobile Home Park (www.halifaxestates.coop) have made history, closing on the largest-ever limited equity manufactured home cooperative purchase while helping secure the financial futures of the 700 retirement-age residents who live there.

While the \$27 million purchase is certainly a milestone in the cooperative and manufactured housing sectors, the impact is life changing for the people who live in the 430 homes in Halifax Estates.

Nancy Froio, president of the residents association that purchased Halifax Estates, and her husband downsized into Halifax more than 12 years ago and fell in love with the community. A widow for nine years now, Froio is thankful that her neighborhood won't be sold again now that she and her neighbors own it.

"I'm so excited about this, it means the world to me because it's the best thing for the residents," said Froio, a retired printing company employee in her 70s. "With so many of our residents retired and on fixed incomes, knowing we're going to own it and run it the way we want to run it is such a relief. Now everyone is going to have a say."

Froio touted several reasons why the homeowners are working to keep their community such a terrific place to live in retirement. She pointed to a robust community workshop, where residents can work and borrow all sorts of woodworking tools, a clubhouse with billiards, table tennis, exercise equipment, an impressive library, bingo setup and more. Residents also enjoy shuffleboard, bocce (outdoors and, in winter, indoors), monthly bus trips, card clubs, a community garden and crafting groups.

The Helping Hands Committee holds fundraisers to support those in Halifax Estates who are struggling, including paying for heating fuel, fixing leaky roofs, mowing lawns, as well as providing transportation to and from medical appointments. All work is carried out anonymously.

Halifax Estates residents also give back to their greater community. The Singing Seniors perform at the clubhouse and take the show on the road to perform at nursing homes and other local institutions. The annual craft fair raises money that

residents use to shop for needy children during the holidays. "We always have a wrapping party and tell folks to show up with scissors and tape," Froio said. "This year we'll sponsor 12 kids."

The resident association has purchased the community for \$27 million with assistance from Cooperative Development Institute. CDI is a certified technical assistance provider with ROC USA® Network. ROC USA is a non-profit that works nationally through a network of nine such technical assistance providers to assist residents of for-sale mobile home parks form resident corporations and buy their communities cooperatively. Technical assistance will continue to be provided by CDI to the association for the length of the mortgage – a minimum of 10 years.

Halifax Estates is the 18th Massachusetts community supported by ROC USA Network and the 210th nationwide. In all, the nine technical assistance providers in ROC USA Network work with 13,500 households in 14 states. In these democratic resident-owned communities (ROCs), homeowners each buy one low-cost membership interest. Each household has one vote on matters of the community. The members elect a Board of Directors to act on day-to-day issues and vote as a membership on larger matters like the annual budget, bylaws and community rules.

Financing for the project came from ROC USA® Capital in collaboration from TD Bank, Bank of America, Boston Community Capital and Leviticus 25:23 Alternative Fund. ROC USA Capital is a wholly-owned subsidiary of ROC USA and a U.S. Department of Treasury-certified Community Development Financial Institution.

ROC USA President Paul Bradley praised the Halifax Board and CDI for leading the community through the purchase process. He said the size of this purchase demonstrates not only the motivation of homeowners to gain ownership of the land as a group but also the expanding capacity of the nonprofits that support them.

"Over time there have been lots of owners of large properties who have called and really wanted to sell their communities to the residents – their longtime customers – but assumed there wasn't enough capacity in the nonprofit sector to do so," Bradley said. "We are showing with our affiliates and with

Nine-Woman Board Leads 430-Home Manufactured Home Community cont.

the leadership of homeowners that larger and increasingly more expensive properties are strong candidates for resident ownership. It's where we've needed to be, and now we're there!"

Froio said the community leaders will pause to celebrate the purchase with an open-house party, but then will get right to work managing their cooperative business.

"We want to tweak the community rules and work on improving access to the clubhouse for our residents who have trouble getting around," she said. "We have some tree work and other routine maintenance issues, but we're getting more people involved and we'll get it taken care of quickly."



Bret L. Strong is the Managing Shareholder of The Strong Firm P.C., a boutique law firm specializing in real estate, lending and business transactions, representing owners, developers, sellers, purchasers, borrowers and lenders operating in the real estate sector. www.TheStrongFirm.com



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Amazon, Tesla and Manufactured Home Communities: A Treatise on Reality Investing

By Dave Reynolds

Maybe I'm old-fashioned, but I was raised on the concept of simple numerical realities – such as $2+2=4$. So I was blown away yesterday when I read about Tesla's recent, massive quarterly loss, followed by the statement that it is "the second-most valuable U.S. automaker behind General Motors Co, which had annual net profit of \$9.4 billion in 2016". Let me get this straight: Tesla (which has lost money continuously since inception) is now valued above Ford (which makes money) and is only second to a company that makes \$9.4 billion per year? And then there's Amazon, which is valued at \$525 billion without ever having actually earned a dime. Am I missing something? It occurs to me that somebody is crazy, and I think it's the American public. So why am I convinced that I'm better off owning manufactured home communities than shares in Tesla or Amazon?

Speculation is rarely a winning plan

So how can a company with zero earnings – or giant losses – be worth vast sums of money? It's because American stockholders are apparently fine with gambling. Because that's what "speculation" is. It's simply gambling on future outcomes without any concrete facts as to why things will turn out as you hope. Every time that somebody buys a share of Tesla stock, they might as well be putting it all on red #25 in Vegas. This is completely dissimilar to manufactured home community investing, in which you can get a strong handle on exactly what you are investing in based on due diligence. These values are safeguarded by an appraisal, which affirms the price you are paying – a service that does not exist in the American stock market. Of course, the Tesla or Amazon fan would argue that these companies have technologies that will one day make them wildly valuable. That would, in some ways, be similar to the manufactured home community seller who proclaims that the lot rent will one day be \$600 per month when it's currently \$200. Smart investors pay for what's there today, and the rest is upside that the owner deserves for the trouble of risking their capital. Only a fool would give huge current value to the weak promise of future gain.

Cool logos and catchy marketing does not make money

I think one of the strengths of manufactured home community investing is that you are often buying properties that have no sizzle. It is what it is. However, Amazon and Tesla try to garner investor interest by utilizing catchy logos and slick marketing. The problem is that these gimmicks make you think that things are in much better shape than what they actually are. Enron had a classy logo, too. There is no guarantee that fancy marketing equates to fancy earnings. Just the opposite – it often hides the true risks and lack of potential. Think of it as a pretty wrapped box that hides a lousy Christmas present. The value of a company must be based on earnings. Period.

I think that any good investor would agree that company valuations should tie back to actual earnings. That's one of the things I love about manufactured home community investing – actual net income is correlated back to the purchase price in the form of the cap rate. Based on that analysis, both Tesla and Amazon would be valueless. They may have interesting ideas, but until those ideas have manifested themselves into net income they are not truly worthy of any kind of meaningful valuation. Can you imagine if a manufactured home community appeared on MobileHomeParkStore.com with an implied cap rate of 0%. Do you think it would get any calls? Offers? Yet investors buy stock in Tesla and Amazon – hundreds of thousands of shares per day – at the same level.

New technologies are often the kingdom of suckers

Does anyone remember the Sony Betamax? It was supposedly the final solution to video entertainment. Its reign lasted for only a short while before the next great invention came out and the investors were left with a big pile of garage sale items. Manufactured home communities are based on a business model that has been around for more than a half-century, and has no likelihood of further innovation. It's important to note that the community business has remain relatively unchanged since 1940 – only the homes have evolved from flat roofs to pitched.

Conclusion

I'm sure that I'll never really understand the values of Amazon and Tesla. They violate every possible rule in investing in my book. Some people may say that manufactured home community owners are old-fashioned. Let's see what they say a decade from now. Eventually the American public is going to realize that net income is all that matters when investing your hard-earned dollars.



Dave Reynolds has been a manufactured home community owner for almost two decades, and currently ranks as part of the 5th largest community owner in the United States, with more than 23,000 lots in 28 states in the Great Plains and Midwest. His books and courses on community acquisitions and management are the top-selling ones in the industry. He is also the founder of the largest listing site for manufactured home communities, MobileHomeParkStore.com. To learn more about Dave's views on the manufactured home community industry visit www.MobileHomeUniversity.com.

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