

## HOUSE OF REPRESENTATIVES

DAVID SCHWEIKERT, ARIZONA, CHAIRMAN  
JODEY C. ARRINGTON, TEXAS  
RON ESTES, KANSAS  
LLOYD K. SMUCKER, PENNSYLVANIA  
NICOLE MALLIOTAKIS, NEW YORK  
VICTORIA SPARTZ, INDIANA

DONALD S. BEYER JR., VIRGINIA  
GWEN MOORE, WISCONSIN  
SEAN CASTEN, ILLINOIS  
DAVE MIN, CALIFORNIA

RON DONADO, EXECUTIVE DIRECTOR

## Congress of the United States

JOINT ECONOMIC COMMITTEE  
(CREATED PURSUANT TO SEC. 5(a) OF PUBLIC LAW 304, 79TH CONGRESS)

Washington, DC 20510-6602

## SENATE

ERIC SCHMITT, MISSOURI, VICE CHAIRMAN  
TOM COTTON, ARKANSAS  
TED BUDD, NORTH CAROLINA  
DAVID MCCORMICK, PENNSYLVANIA  
MARSHA BLACKBURN, TENNESSEE  
ASHLEY MOODY, FLORIDA

MARGARET WOOD HASSAN, NEW HAMPSHIRE,  
RANKING MEMBER  
AMY KLOBUCHAR, MINNESOTA  
MARTIN HEINRICH, NEW MEXICO  
MARK KELLY, ARIZONA

LAURA EPSTEIN, DEMOCRATIC STAFF DIRECTOR

December 8, 2025

Eli Weiner  
President & Founder  
The BoaVida Group  
1910 Terracina Drive  
Sacramento, CA 95834

Dear Mr. Weiner:

I am writing to request information from The BoaVida Group regarding the impact of its business practices on manufactured housing communities in New England. An estimated 22 million Americans live in manufactured homes,<sup>1</sup> and in recent years, investment firms have increasingly purchased manufactured housing communities, with total estimated purchases as high as \$9.4 billion in 2021.<sup>2</sup> According to one June 2021 analysis, acquisitions by investment firms – including The BoaVida Group<sup>3</sup> – accounted for 23 percent of manufactured housing community sales over the previous two years.<sup>4</sup> Given this impact on our economy, public reports of concerns with the management of some manufactured home communities, and the pressing need to increase access to safe, reliable housing that people can afford, I seek more information on your business practices.

Residents of manufactured housing communities include significant numbers of seniors, people with disabilities, low-income families, and people who live in rural areas.<sup>5</sup> In addition, residents often have limited ability to move; homes can be difficult to resell, and homeowners rarely relocate them because of the costs and risk of structural damage.<sup>6</sup> Therefore, residents may

---

<sup>1</sup> Manufactured Housing Institute, Research and Data ([www.manufacturedhousing.org/home/research-data/](http://www.manufacturedhousing.org/home/research-data/)) (accessed July 7, 2025).

<sup>2</sup> Government Accountability Office, *Manufactured Housing: Further HUD Action is Needed to Increase Available Loan Products* (GAO-23-105615) (Sept. 26, 2023).

<sup>3</sup> The BoaVida Group, *About BoaVida* (accessed Dec. 4, 2025).

<sup>4</sup> *Investors Are Buying Mobile Home Parks. Residents Are Paying a Price*, New York Times (Mar. 27, 2022) ([www.nytimes.com/2022/03/27/us/mobile-home-park-ownership-costs.html](http://www.nytimes.com/2022/03/27/us/mobile-home-park-ownership-costs.html)).

<sup>5</sup> Legal Services Corporation, *Housing Insecurity in the United States and the Role of Legal Aid* (Mar. 22, 2023) ([lsc-live.box.com/s/vn8det0gmcbepeadan5mr1hkrxjo76kdf](https://lsc-live.box.com/s/vn8det0gmcbepeadan5mr1hkrxjo76kdf)).

<sup>6</sup> *Id.*

have few if any options when faced with egregious rent increases, changes in lease terms, or other business decisions by community owners.<sup>7</sup>

More than four million manufactured homes in the United States are located in communities in which residents often own their homes but rent the land beneath them,<sup>8</sup> which can make residents particularly vulnerable to changes that the landowners may make. According to the *New York Times*, manufactured housing communities have been “ripe targets for investors, who buy communities and then increase the lot rents.”<sup>9</sup> Between 2023 and 2024, rents in these communities grew more than five times the pace of rent growth in traditional apartment buildings.<sup>10</sup> Since 2021 in Maine, for example, The BoaVida Group and Philips International have reportedly raised rents more than 50 percent in some communities.<sup>11</sup> Some firms highlight rent growth as part of their investment strategy; Patriot Holdings, one owner with multiple communities in New England, advertises that investors can expect “rent increases *in line* with market demand” – a demand it describes as “booming.”<sup>12</sup> In some cases, the potentially exploitative nature of such practices has drawn legal attention. In 2024, for example, Homes of America agreed to repay residents in West Virginia to settle claims related to an allegedly unlawful rent increase that residents described as “unconscionable and inequitable.”<sup>13</sup>

In addition, investment firms have allegedly coordinated to raise rents in manufactured housing communities nationwide. For example, a 2023 complaint filed in federal court in Illinois

---

<sup>7</sup> *PESP Private Equity Manufactured Housing Tracker*, *supra* note 1.

<sup>8</sup> Manufactured Housing Institute, *2022 Manufactured Housing Facts* (Aug. 2022) ([web.archive.org/web/20230529230808/www.manufacturedhousing.org/wp-content/uploads/2022/04/2022-MHI-Quick-Facts-updated-05-2022-2.pdf](https://web.archive.org/web/20230529230808/www.manufacturedhousing.org/wp-content/uploads/2022/04/2022-MHI-Quick-Facts-updated-05-2022-2.pdf)).

<sup>9</sup> *Residents of a Mobile Home Park Join Forces to Buy Their Community*, *New York Times* (Oct. 24, 2024) ([www.nytimes.com/2024/10/10/realestate/brunswick-mobile-home-sale-maine.html](https://www.nytimes.com/2024/10/10/realestate/brunswick-mobile-home-sale-maine.html)).

<sup>10</sup> Fannie Mae, *September 2024: Fundamentals at MHCs Remain Tight but Lending Volume Decline* (Sept. 2024) ([www.fanniemae.com/media/53321/display](https://www.fanniemae.com/media/53321/display)).

<sup>11</sup> Maine State Legislature Housing and Economic Development Committee, Testimony Submitted for the Record of Antoinette Rodrigues, *Hearing on An Act to Amend the Laws Governing Manufactured Housing Communities to Prevent Excessive Rent and Fees Increases*, 132nd Me. Leg., 1st Sess. (May 2, 2025); The Genesis Fund, *Mobile Home Communities in Maine and the United States* (Mar. 2025) ([genesisfund.org/wp-content/uploads/2025/04/FINAL-Maine-Mobile-Home-Community-Research-April-2025.pdf](https://genesisfund.org/wp-content/uploads/2025/04/FINAL-Maine-Mobile-Home-Community-Research-April-2025.pdf)).

<sup>12</sup> Patriot Holdings, *Patriot Investment Philosophy* ([www.patriotholdings.com/investment-philosophy](https://www.patriotholdings.com/investment-philosophy)) (accessed Aug. 6, 2025) (emphasis added).

<sup>13</sup> Health in Partnership, *Home Sick: Uncovering the Health Harms in Homes of America’s Manufactured Housing Communities* (May 6, 2025) ([www.healthinpartnership.org/resources/home-sick-uncovering-the-health-harms-in-homes-of-americas-manufactured-housing-communities](https://www.healthinpartnership.org/resources/home-sick-uncovering-the-health-harms-in-homes-of-americas-manufactured-housing-communities)).

against Sun Communities, among other parties, alleges that the firm exchanged non-public, competitively sensitive information with other community owners through a third-party analytics provider.<sup>14</sup> According to the complaint, this arrangement allowed the defendants “to increase manufactured home lot rents systematically and unlawfully.”<sup>15</sup> The complaint also notes that the rents exceeded both the rate of inflation and historical trends.<sup>16</sup> Attorneys general in Connecticut and Minnesota have also opened investigations into rent practices at investor-owned communities.<sup>17</sup>

Residents have also reported that certain investment firms neglect community maintenance and cause living conditions to deteriorate. In New Mexico, for example, one resident described Legacy Communities’ approach: “[T]he first thing they started doing was raising our rent, decreasing our property values by not keeping up the property, [and] firing all the staff that they had that knew how to keep up the property.”<sup>18</sup> Despite the firm’s claim that higher rents fund maintenance and improvements,<sup>19</sup> residents said that “their rent has gone up significantly while necessary fixes and upkeep have diminished.”<sup>20</sup> Residents of communities that The BoaVida Group and Philips International own in New England have raised similar concerns about poor community maintenance and, in some cases, health hazards.<sup>21</sup> Relatedly, a recent report on Homes of America communities found examples of serious neglect – including poor water quality and availability, pest infestations, and decaying infrastructure – that persisted for months and caused severe health impacts, including respiratory illnesses.<sup>22</sup>

Legal and procedural hurdles can complicate residents’ efforts to challenge the types of issues described above. Residents in Homes of America communities, for example, have

---

<sup>14</sup> Class Action Complaint, *Hajek et al. v. DataComp Appraisal Systems, Inc.*, No. 23-cv-6715 (N.D. Ill. Oct. 31, 2023).

<sup>15</sup> *Id.*

<sup>16</sup> *Id.*

<sup>17</sup> *Id.*

<sup>18</sup> *Mobile Home Park Residents Hope New Ordinance Will Protect Them*, KOB 4 (Jan. 26, 2025) ([www.kob.com/news/top-news/mobile-home-park-residents-hope-new-ordinance-will-protect-them/](http://www.kob.com/news/top-news/mobile-home-park-residents-hope-new-ordinance-will-protect-them/)).

<sup>19</sup> Andrew Fells, President, Legacy Communities, *Statement from Andrew Fells, President, Legacy Communities* (Feb. 2024) ([www.kob.com/wp-content/uploads/2024/02/Statement-from-Legacy-Communities.pdf](http://www.kob.com/wp-content/uploads/2024/02/Statement-from-Legacy-Communities.pdf)).

<sup>20</sup> *Mobile Home Park Residents Hope New Ordinance Will Protect Them*, *supra* note 22.

<sup>21</sup> Antoinette Rodrigues, *supra* note 15; Maine State Legislature Housing and Economic Development Committee, Testimony Submitted for the Record of Missy Erving, *Hearing on An Act to Amend the Laws Governing Manufactured Housing Communities to Prevent Excessive Rent and Fees Increases*, 132nd Me. Leg., 1st Sess. (May 2, 2025).

<sup>22</sup> Health in Partnership, *supra* note 17.

described a range of retaliatory strategies that the company has pursued to limit its legal exposure. In one example, residents in West Virginia alleged that Homes of America threatened to make their monthly rents “substantially higher” unless they signed releases “of all rights under [the West Virginia Manufactured House Act].”<sup>23</sup> In another example, Homes of America reportedly sued a resident for interfering with the company’s “contractual relationship” with the community after she organized clinics to educate her neighbors about their rights.<sup>24</sup> At the same time, investment firms have reportedly created barriers to shield themselves from resident lawsuits. According to a study published in the *Journal of Affordable Housing*, some actors in the manufactured housing industry have used “onerous arbitration provisions” that can “augment [resident-plaintiffs’] costs and diminish their procedural protections.”<sup>25</sup> Investment firms also “often hide behind multiple shell [companies]” that obscure community ownership and the proper party for residents to sue.<sup>26</sup> The Government Accountability Office has similarly found that “information is limited on who or what company owns manufactured housing communities.”<sup>27</sup>

To aid Congress in understanding the impact of The BoaVida Group’s business practices on residents of its manufactured housing communities, please provide responses to the following document and information requests. Unless otherwise specified, these requests cover the period of January 1, 2020, to the present:

1. Documents sufficient to show the ownership and organizational structure of The BoaVida Group;
2. Any reports or presentations (including slide decks) concerning the corporate strategies of The BoaVida Group or affiliated LLCs as they relate to manufactured housing communities and:
  - a. Rent increases;
  - b. Resident fees;
  - c. Operating cost management;
  - d. Capital expenditures;
  - e. Resident turnover;
  - f. Resident organizing activity;
  - g. Community disposition;
  - h. The use of public financing, including from Fannie Mae or Freddie Mac; and

---

<sup>23</sup> Class Action Counterclaim, *Steele et al. v. Elk View MHP LLC*, No. CC-28-2024-C-171 (Va. Cir. Ct. Mercer Cnty. 2024).

<sup>24</sup> *Vulture Wars: Alden Global Capital’s Assault on Manufactured Housing Residents*, *supra* note 6.

<sup>25</sup> Amy J. Schmitz, *Promoting the Promise Manufactured Homes Provide for Affordable Housing*, *Journal of Affordable Housing and Community Development Law* (2004).

<sup>26</sup> Health in Partnership, *supra* note 17.

<sup>27</sup> Government Accountability Office, *supra* note 5.

- i. The use of tax incentives, including Opportunity Zones;
3. The number of manufactured homes, if any, The BoaVida Group or affiliated LLCs rent to residents while these entities do not hold title, broken down by ZIP code;
4. The number of manufactured homes, if any, The BoaVida Group or affiliated LLCs have demolished, broken down by ZIP code;
5. The number of manufactured housing communities, if any, The BoaVida Group or affiliated LLCs have disposed of, redeveloped, or otherwise changed the use of, broken down by ZIP code;
6. A list of all settlements of litigation, including the date and terms of the settlement and a summary of the plaintiff's claims, related to a potential violation of any federal or state laws or regulations during ownership or operation of a manufactured housing community by The BoaVida Group or affiliated LLCs;

For each community listed in Schedule A, please provide the following information:

7. Documents sufficient to show ownership and organizational structure of the community, including percent ownership by The BoaVida Group and related entities, management staff and their roles, and any changes to these arrangements over time;
8. Documents sufficient to show state and local licensing to operate the community;
9. Documents sufficient to show whether and how the community has been used as collateral in any financing obtained by The BoaVida Group or affiliated LLCs;
10. Documents sufficient to show any recapitalization or similar refinancing of the community by The BoaVida Group or affiliated LLCs;
11. All policies, procedures, and guidelines related to the following topics:
  - a. Setting and adjusting lot rents over time, including criteria and data sources considered; any software, tools, or third-party services used; and any references to market rates or competitor rents;
  - b. Rent-to-own-contracts;
  - c. Fees for home installation, late rent payments, utilities, amenities, services, the sale of a home by a resident, and the removal or relocation of a home from the community;
  - d. Eviction actions, including criteria that triggers action and notice requirements;
  - e. Maintenance and community infrastructure repairs (e.g., staffing levels, plumbing, HVAC, pest control, road repairs, amenities, waste removal, and landscaping);

- f. Capital expenditures and the connection between these expenditures and increases in rent or fees; and
  - g. Resident organizing activity (e.g., resident meetings and associations, class action cooperation, and engagement with policymakers and media);
12. Per month, covering the period of 365 days before the purchase date for the community to the present:
- a. Number of occupied and vacant homes;
  - b. Number of residents;
  - c. Number of homes owned by residents, under rent-to-own contracts, or rented to residents;
  - d. Average lot rent;
  - e. Total resident fees, broken down by fees for home installation, late rent payments, utilities, amenities, services, the sale of a home by a resident, and the removal or relocation of a home from the community;
  - f. Total fees paid by an affiliated LLC, if any, that owns or operates the community;
  - g. Total accounts receivable;
  - h. Net income;
  - i. Number of complaints filed by residents concerning the management or conditions of the community;
  - j. Number of maintenance requests submitted by residents;
  - k. Number of arbitration clauses, waivers, and releases presented to or signed by residents;
  - l. Number of eviction notices issued, eviction actions filed, and eviction actions resulting in the removal of a resident;
  - m. Number of demolished homes;
  - n. Number of homes newly placed in the community;
  - o. Itemized capital expenditures;
  - p. Itemized maintenance costs;
  - q. Itemized operating costs not categorized as capital expenditures or maintenance;
  - r. Any reports or warnings received from federal, state, or local authorities concerning housing, building, and health code violations, as well as water quality reports;
  - s. Documents sufficient to show the status of any corrective actions taken due to a code violation or report;
  - t. Any reports or warnings from a federal, state, or local authority concerning the community's licensing status;
13. Standard lease agreements, arbitration clauses, waivers, releases, home financing agreements (including rent-to-own contracts), home financing promotional materials, and written rules for the community and residents;

14. A summary of each instance in which The BoaVida Group or an affiliated LLC offered a release of claims to a manufactured housing community resident, including information regarding:
- a. The date the release was offered or signed;
  - b. The circumstances giving rise to the offer (e.g., ongoing litigation, rent dispute, lease agreement negotiation, resident complaint to management or third parties);
  - c. The claims or potential claims covered by the release; and
  - d. Any incentives offered to the resident in exchange for the release.

Please provide your responses as soon as possible but in no event later than January 5, 2026. If you have any questions related to this request, please contact [REDACTED] of the Committee staff at [REDACTED] or [REDACTED]. Please send any official correspondence relating to this request to [REDACTED].

Sincerely,



---

Margaret Wood Hassan  
Ranking Member

cc: David Schweikert  
Chairman, Joint Economic Committee

Eric Schmitt  
Vice Chairman, Joint Economic Committee

**Schedule A**

**1. The BoaVida Group**

- a. Tara Estates
  - 53 Eagle Drive, Rochester, NH 03868
- b. Briar Ridge
  - 40 Lilac Drive, Rochester, NH 03867
- c. Kings Towne
  - 1 Archer Circle, Epsom, NH 03234



## HOUSE OF REPRESENTATIVES

DAVID SCHWEIKERT, ARIZONA, CHAIRMAN  
JODEY C. ARRINGTON, TEXAS  
RON ESTES, KANSAS  
LLOYD K. SMUCKER, PENNSYLVANIA  
NICOLE MALLIOTAKIS, NEW YORK  
VICTORIA SPARTZ, INDIANA

DONALD S. BEYER JR., VIRGINIA  
GWEN MOORE, WISCONSIN  
SEAN CASTEN, ILLINOIS  
DAVE MIN, CALIFORNIA

RON DONADO, EXECUTIVE DIRECTOR

## Congress of the United States

JOINT ECONOMIC COMMITTEE  
(CREATED PURSUANT TO SEC. 5(a) OF PUBLIC LAW 304, 79TH CONGRESS)

Washington, DC 20510-6602

## SENATE

ERIC SCHMITT, MISSOURI, VICE CHAIRMAN  
TOM COTTON, ARKANSAS  
TED BUDD, NORTH CAROLINA  
DAVID MCCORMICK, PENNSYLVANIA  
MARSHA BLACKBURN, TENNESSEE  
ASHLEY MOODY, FLORIDA

MARGARET WOOD HASSAN, NEW HAMPSHIRE,  
RANKING MEMBER  
AMY KLOBUCHAR, MINNESOTA  
MARTIN HEINRICH, NEW MEXICO  
MARK KELLY, ARIZONA

LAURA EPSTEIN, DEMOCRATIC STAFF DIRECTOR

December 8, 2025

Charles D. Young  
CEO & Director  
Sun Communities  
27777 Franklin Road, Suite #300  
Southfield, Michigan 48034

Dear Mr. Young:

I am writing to request information from Sun Communities regarding the impact of its business practices on manufactured housing communities in New England. An estimated 22 million Americans live in manufactured homes,<sup>1</sup> and in recent years, investment firms have increasingly purchased manufactured housing communities, with total estimated purchases as high as \$9.4 billion in 2021.<sup>2</sup> According to one June 2021 analysis, acquisitions by investment firms – including Sun Communities<sup>3</sup> – accounted for 23 percent of manufactured housing community sales over the previous two years.<sup>4</sup> Given this impact on our economy, public reports of concerns with the management of some manufactured home communities, and the pressing need to increase access to safe, reliable housing that people can afford, I seek more information on your business practices.

Residents of manufactured housing communities include significant numbers of seniors, people with disabilities, low-income families, and people who live in rural areas.<sup>5</sup> In addition, residents often have limited ability to move; homes can be difficult to resell, and homeowners

---

<sup>1</sup> Manufactured Housing Institute, Research and Data ([www.manufacturedhousing.org/home/research-data/](http://www.manufacturedhousing.org/home/research-data/)) (accessed July 7, 2025).

<sup>2</sup> Government Accountability Office, *Manufactured Housing: Further HUD Action is Needed to Increase Available Loan Products* (GAO-23-105615) (Sept. 26, 2023).

<sup>3</sup> Sun Communities, Investor Relations ([www.suninc.com/investor-relations](http://www.suninc.com/investor-relations)) (accessed Dec. 4, 2025).

<sup>4</sup> *Investors Are Buying Mobile Home Parks. Residents Are Paying a Price*, New York Times (Mar. 27, 2022) ([www.nytimes.com/2022/03/27/us/mobile-home-park-ownership-costs.html](http://www.nytimes.com/2022/03/27/us/mobile-home-park-ownership-costs.html)).

<sup>5</sup> Legal Services Corporation, *Housing Insecurity in the United States and the Role of Legal Aid* (Mar. 22, 2023) ([lsc-live.box.com/s/vn8det0gmcbepeadan5mr1hkrxjo76kdf](https://lsc-live.box.com/s/vn8det0gmcbepeadan5mr1hkrxjo76kdf)).

rarely relocate them because of the costs and risk of structural damage.<sup>6</sup> Therefore, residents may have few if any options when faced with egregious rent increases, changes in lease terms, or other business decisions by community owners.<sup>7</sup>

More than four million manufactured homes in the United States are located in communities in which residents often own their homes but rent the land beneath them,<sup>8</sup> which can make residents particularly vulnerable to changes that the landowners may make. According to the *New York Times*, manufactured housing communities have been “ripe targets for investors, who buy communities and then increase the lot rents.”<sup>9</sup> Between 2023 and 2024, rents in these communities grew more than five times the pace of rent growth in traditional apartment buildings.<sup>10</sup> Since 2021 in Maine, for example, The BoaVida Group and Philips International have reportedly raised rents more than 50 percent in some communities.<sup>11</sup> Some firms highlight rent growth as part of their investment strategy; Patriot Holdings, one owner with multiple communities in New England, advertises that investors can expect “rent increases *in line* with market demand” – a demand it describes as “booming.”<sup>12</sup> In some cases, the potentially exploitative nature of such practices has drawn legal attention. In 2024, for example, Homes of America agreed to repay residents in West Virginia to settle claims related to an allegedly unlawful rent increase that residents described as “unconscionable and inequitable.”<sup>13</sup>

---

<sup>6</sup> *Id.*

<sup>7</sup> *PESP Private Equity Manufactured Housing Tracker*, *supra* note 1.

<sup>8</sup> Manufactured Housing Institute, *2022 Manufactured Housing Facts* (Aug. 2022) ([web.archive.org/web/20230529230808/www.manufacturedhousing.org/wp-content/uploads/2022/04/2022-MHI-Quick-Facts-updated-05-2022-2.pdf](https://web.archive.org/web/20230529230808/www.manufacturedhousing.org/wp-content/uploads/2022/04/2022-MHI-Quick-Facts-updated-05-2022-2.pdf)).

<sup>9</sup> *Residents of a Mobile Home Park Join Forces to Buy Their Community*, *New York Times* (Oct. 24, 2024) ([www.nytimes.com/2024/10/10/realestate/brunswick-mobile-home-sale-maine.html](https://www.nytimes.com/2024/10/10/realestate/brunswick-mobile-home-sale-maine.html)).

<sup>10</sup> Fannie Mae, *September 2024: Fundamentals at MHCs Remain Tight but Lending Volume Decline* (Sept. 2024) ([www.fanniemae.com/media/53321/display](https://www.fanniemae.com/media/53321/display)).

<sup>11</sup> Maine State Legislature Housing and Economic Development Committee, Testimony Submitted for the Record of Antoinette Rodrigues, *Hearing on An Act to Amend the Laws Governing Manufactured Housing Communities to Prevent Excessive Rent and Fees Increases*, 132nd Me. Leg., 1st Sess. (May 2, 2025); The Genesis Fund, *Mobile Home Communities in Maine and the United States* (Mar. 2025) ([genesisfund.org/wp-content/uploads/2025/04/FINAL-Maine-Mobile-Home-Community-Research-April-2025.pdf](https://genesisfund.org/wp-content/uploads/2025/04/FINAL-Maine-Mobile-Home-Community-Research-April-2025.pdf)).

<sup>12</sup> Patriot Holdings, *Patriot Investment Philosophy* ([www.patriotholdings.com/investment-philosophy](https://www.patriotholdings.com/investment-philosophy)) (accessed Aug. 6, 2025) (emphasis added).

<sup>13</sup> Health in Partnership, *Home Sick: Uncovering the Health Harms in Homes of America’s Manufactured Housing Communities* (May 6, 2025) ([www.healthinpartnership.org/resources/home-sick-uncovering-the-health-harms-in-homes-of-americas-manufactured-housing-communities](https://www.healthinpartnership.org/resources/home-sick-uncovering-the-health-harms-in-homes-of-americas-manufactured-housing-communities)).

In addition, investment firms have allegedly coordinated to raise rents in manufactured housing communities nationwide. For example, a 2023 complaint filed in federal court in Illinois against Sun Communities, among other parties, alleges that the firm exchanged non-public, competitively sensitive information with other community owners through a third-party analytics provider.<sup>14</sup> According to the complaint, this arrangement allowed the defendants “to increase manufactured home lot rents systematically and unlawfully.”<sup>15</sup> The complaint also notes that the rents exceeded both the rate of inflation and historical trends.<sup>16</sup> Attorneys general in Connecticut and Minnesota have also opened investigations into rent practices at investor-owned communities.<sup>17</sup>

Residents have also reported that certain investment firms neglect community maintenance and cause living conditions to deteriorate. In New Mexico, for example, one resident described Legacy Communities’ approach: “[T]he first thing they started doing was raising our rent, decreasing our property values by not keeping up the property, [and] firing all the staff that they had that knew how to keep up the property.”<sup>18</sup> Despite the firm’s claim that higher rents fund maintenance and improvements,<sup>19</sup> residents said that “their rent has gone up significantly while necessary fixes and upkeep have diminished.”<sup>20</sup> Residents of communities that The BoaVida Group and Philips International own in New England have raised similar concerns about poor community maintenance and, in some cases, health hazards.<sup>21</sup> Relatedly, a recent report on Homes of America communities found examples of serious neglect – including poor water quality and availability, pest infestations, and decaying infrastructure – that persisted for months and caused severe health impacts, including respiratory illnesses.<sup>22</sup>

---

<sup>14</sup> Class Action Complaint, *Hajek et al. v. DataComp Appraisal Systems, Inc.*, No. 23-cv-6715 (N.D. Ill. Oct. 31, 2023).

<sup>15</sup> *Id.*

<sup>16</sup> *Id.*

<sup>17</sup> *Id.*

<sup>18</sup> *Mobile Home Park Residents Hope New Ordinance Will Protect Them*, KOB 4 (Jan. 26, 2025) ([www.kob.com/news/top-news/mobile-home-park-residents-hope-new-ordinance-will-protect-them/](http://www.kob.com/news/top-news/mobile-home-park-residents-hope-new-ordinance-will-protect-them/)).

<sup>19</sup> Andrew Fells, President, Legacy Communities, *Statement from Andrew Fells, President, Legacy Communities* (Feb. 2024) ([www.kob.com/wp-content/uploads/2024/02/Statement-from-Legacy-Communities.pdf](http://www.kob.com/wp-content/uploads/2024/02/Statement-from-Legacy-Communities.pdf)).

<sup>20</sup> *Mobile Home Park Residents Hope New Ordinance Will Protect Them*, *supra* note 22.

<sup>21</sup> Antoinette Rodrigues, *supra* note 15; Maine State Legislature Housing and Economic Development Committee, Testimony Submitted for the Record of Missy Erving, *Hearing on An Act to Amend the Laws Governing Manufactured Housing Communities to Prevent Excessive Rent and Fees Increases*, 132nd Me. Leg., 1st Sess. (May 2, 2025).

<sup>22</sup> Health in Partnership, *supra* note 17.

Legal and procedural hurdles can complicate residents' efforts to challenge the types of issues described above. Residents in Homes of America communities, for example, have described a range of retaliatory strategies that the company has pursued to limit its legal exposure. In one example, residents in West Virginia alleged that Homes of America threatened to make their monthly rents "substantially higher" unless they signed releases "of all rights under [the West Virginia Manufactured House Act]." <sup>23</sup> In another example, Homes of America reportedly sued a resident for interfering with the company's "contractual relationship" with the community after she organized clinics to educate her neighbors about their rights. <sup>24</sup> At the same time, investment firms have reportedly created barriers to shield themselves from resident lawsuits. According to a study published in the *Journal of Affordable Housing*, some actors in the manufactured housing industry have used "onerous arbitration provisions" that can "augment [resident-plaintiffs'] costs and diminish their procedural protections." <sup>25</sup> Investment firms also "often hide behind multiple shell [companies]" that obscure community ownership and the proper party for residents to sue. <sup>26</sup> The Government Accountability Office has similarly found that "information is limited on who or what company owns manufactured housing communities." <sup>27</sup>

To aid Congress in understanding the impact of Sun Communities's business practices on residents of its manufactured housing communities, please provide responses to the following document and information requests. Unless otherwise specified, these requests cover the period of January 1, 2020, to the present:

1. Documents sufficient to show the ownership and organizational structure of Sun Communities;
2. Any reports or presentations (including slide decks) concerning the corporate strategies of Sun Communities or affiliated LLCs as they relate to manufactured housing communities and:
  - a. Rent increases;
  - b. Resident fees;
  - c. Operating cost management;
  - d. Capital expenditures;
  - e. Resident turnover;
  - f. Resident organizing activity;

---

<sup>23</sup> Class Action Counterclaim, *Steele et al. v. Elk View MHP LLC*, No. CC-28-2024-C-171 (Va. Cir. Ct. Mercer Cnty. 2024).

<sup>24</sup> *Vulture Wars: Alden Global Capital's Assault on Manufactured Housing Residents*, *supra* note 6.

<sup>25</sup> Amy J. Schmitz, *Promoting the Promise Manufactured Homes Provide for Affordable Housing*, *Journal of Affordable Housing and Community Development Law* (2004).

<sup>26</sup> *Health in Partnership*, *supra* note 17.

<sup>27</sup> Government Accountability Office, *supra* note 5.

- g. Community disposition;
  - h. The use of public financing, including from Fannie Mae or Freddie Mac; and
  - i. The use of tax incentives, including Opportunity Zones;
- 3. The number of manufactured homes, if any, Sun Communities or affiliated LLCs rent to residents while these entities do not hold title, broken down by ZIP code;
- 4. The number of manufactured homes, if any, Sun Communities or affiliated LLCs have demolished, broken down by ZIP code;
- 5. The number of manufactured housing communities, if any, Sun Communities or affiliated LLCs have disposed of, redeveloped, or otherwise changed the use of, broken down by ZIP code;
- 6. A list of all settlements of litigation, including the date and terms of the settlement and a summary of the plaintiff's claims, related to a potential violation of any federal or state laws or regulations during ownership or operation of a manufactured housing community by Sun Communities or affiliated LLCs;

For each community listed in Schedule A, please provide the following information:

- 7. Documents sufficient to show ownership and organizational structure of the community, including percent ownership by Sun Communities and related entities, management staff and their roles, and any changes to these arrangements over time;
- 8. Documents sufficient to show state and local licensing to operate the community;
- 9. Documents sufficient to show whether and how the community has been used as collateral in any financing obtained by Sun Communities or affiliated LLCs;
- 10. Documents sufficient to show any recapitalization or similar refinancing of the community by Sun Communities or affiliated LLCs;
- 11. All policies, procedures, and guidelines related to the following topics:
  - a. Setting and adjusting lot rents over time, including criteria and data sources considered; any software, tools, or third-party services used; and any references to market rates or competitor rents;
  - b. Rent-to-own-contracts;
  - c. Fees for home installation, late rent payments, utilities, amenities, services, the sale of a home by a resident, and the removal or relocation of a home from the community;
  - d. Eviction actions, including criteria that triggers action and notice requirements;

- e. Maintenance and community infrastructure repairs (e.g., staffing levels, plumbing, HVAC, pest control, road repairs, amenities, waste removal, and landscaping);
- f. Capital expenditures and the connection between these expenditures and increases in rent or fees; and
- g. Resident organizing activity (e.g., resident meetings and associations, class action cooperation, and engagement with policymakers and media);

12. Per month, covering the period of 365 days before the purchase date for the community to the present:

- a. Number of occupied and vacant homes;
- b. Number of residents;
- c. Number of homes owned by residents, under rent-to-own contracts, or rented to residents;
- d. Average lot rent;
- e. Total resident fees, broken down by fees for home installation, late rent payments, utilities, amenities, services, the sale of a home by a resident, and the removal or relocation of a home from the community;
- f. Total fees paid by an affiliated LLC, if any, that owns or operates the community;
- g. Total accounts receivable;
- h. Net income;
- i. Number of complaints filed by residents concerning the management or conditions of the community;
- j. Number of maintenance requests submitted by residents;
- k. Number of arbitration clauses, waivers, and releases presented to or signed by residents;
- l. Number of eviction notices issued, eviction actions filed, and eviction actions resulting in the removal of a resident;
- m. Number of demolished homes;
- n. Number of homes newly placed in the community;
- o. Itemized capital expenditures;
- p. Itemized maintenance costs;
- q. Itemized operating costs not categorized as capital expenditures or maintenance;
- r. Any reports or warnings received from federal, state, or local authorities concerning housing, building, and health code violations, as well as water quality reports;
- s. Documents sufficient to show the status of any corrective actions taken due to a code violation or report;
- t. Any reports or warnings from a federal, state, or local authority concerning the community's licensing status;

Mr. Charles D. Young

December 8, 2025

Page 7

13. Standard lease agreements, arbitration clauses, waivers, releases, home financing agreements (including rent-to-own contracts), home financing promotional materials, and written rules for the community and residents;
14. A summary of each instance in which Sun Communities or an affiliated LLC offered a release of claims to a manufactured housing community resident, including information regarding:
  - a. The date the release was offered or signed;
  - b. The circumstances giving rise to the offer (e.g., ongoing litigation, rent dispute, lease agreement negotiation, resident complaint to management or third parties);
  - c. The claims or potential claims covered by the release; and
  - d. Any incentives offered to the resident in exchange for the release.

Please provide your responses as soon as possible but in no event later than January 5, 2026. If you have any questions related to this request, please contact [REDACTED] of the Committee staff at [REDACTED] or [REDACTED]. Please send any official correspondence relating to this request to [REDACTED].

Sincerely,



---

Margaret Wood Hassan  
Ranking Member

cc: David Schweikert  
Chairman, Joint Economic Committee

Eric Schmitt  
Vice Chairman, Joint Economic Committee

**Schedule A**

**1. Sun Communities**

- a. Brook Ridge
  - 3 Mailhouse Road, Hooksett, NH 03106
- b. Crestwood
  - 14 Crestwood Drive, Concord, NH 03301
- c. Farmwood Village
  - 6-1/2 Deerfield Drive, Dover, NH 03820
- d. Hannah Village
  - 14 Bomhower Street, Lebanon, NH 03766
- e. Hemlocks
  - 27 Timberline Drive, Tilton, NH 03276
- f. River Pines
  - 0 River Pines Boulevard, Nashua, NH 03062



HOUSE OF REPRESENTATIVES

DAVID SCHWEIKERT, ARIZONA, CHAIRMAN  
JODEY C. ARRINGTON, TEXAS  
RON ESTES, KANSAS  
LLOYD K. SMUCKER, PENNSYLVANIA  
NICOLE MALLIOTAKIS, NEW YORK  
VICTORIA SPARTZ, INDIANA

DONALD S. BEYER JR., VIRGINIA  
GWEN MOORE, WISCONSIN  
SEAN CASTEN, ILLINOIS  
DAVE MIN, CALIFORNIA

RON DONADO, EXECUTIVE DIRECTOR

Congress of the United States

JOINT ECONOMIC COMMITTEE  
(CREATED PURSUANT TO SEC. 5(a) OF PUBLIC LAW 304, 79TH CONGRESS)

Washington, DC 20510-6602

SENATE

ERIC SCHMITT, MISSOURI, VICE CHAIRMAN  
TOM COTTON, ARKANSAS  
TED BUDD, NORTH CAROLINA  
DAVID MCCORMICK, PENNSYLVANIA  
MARSHA BLACKBURN, TENNESSEE  
ASHLEY MOODY, FLORIDA

MARGARET WOOD HASSAN, NEW HAMPSHIRE,  
RANKING MEMBER  
AMY KLOBUCHAR, MINNESOTA  
MARTIN HEINRICH, NEW MEXICO  
MARK KELLY, ARIZONA

LAURA EPSTEIN, DEMOCRATIC STAFF DIRECTOR

December 8, 2025

Philip Pilevsky  
Chairman & CEO  
Philips International  
40 Cutter Mill Road, Suite 405  
Great Neck, NY 11021

Dear Mr. Pilevsky:

I am writing to request information from Philips International regarding the impact of its business practices on manufactured housing communities in New England. An estimated 22 million Americans live in manufactured homes,<sup>1</sup> and in recent years, investment firms have increasingly purchased manufactured housing communities, with total estimated purchases as high as \$9.4 billion in 2021.<sup>2</sup> According to one June 2021 analysis, acquisitions by investment firms – including Philips International<sup>3</sup> – accounted for 23 percent of manufactured housing community sales over the previous two years.<sup>4</sup> Given this impact on our economy, public reports of concerns with the management of some manufactured home communities, and the pressing need to increase access to safe, reliable housing that people can afford, I seek more information on your business practices.

Residents of manufactured housing communities include significant numbers of seniors, people with disabilities, low-income families, and people who live in rural areas.<sup>5</sup> In addition, residents often have limited ability to move; homes can be difficult to resell, and homeowners

---

<sup>1</sup> Manufactured Housing Institute, Research and Data ([www.manufacturedhousing.org/home/research-data/](http://www.manufacturedhousing.org/home/research-data/)) (accessed July 7, 2025).

<sup>2</sup> Government Accountability Office, *Manufactured Housing: Further HUD Action is Needed to Increase Available Loan Products* (GAO-23-105615) (Sept. 26, 2023).

<sup>3</sup> Philips International states that it has “45 years of successful real estate investment experience.” Philips International, M&A ([www.pihc.com/ma/](http://www.pihc.com/ma/)) (accessed December 4, 2028).

<sup>4</sup> *Investors Are Buying Mobile Home Parks. Residents Are Paying a Price*, New York Times (Mar. 27, 2022) ([www.nytimes.com/2022/03/27/us/mobile-home-park-ownership-costs.html](http://www.nytimes.com/2022/03/27/us/mobile-home-park-ownership-costs.html)).

<sup>5</sup> Legal Services Corporation, *Housing Insecurity in the United States and the Role of Legal Aid* (Mar. 22, 2023) ([lsc-live.box.com/s/vn8det0gmcbeedan5mr1hkrxjo76kdf](https://lsc-live.box.com/s/vn8det0gmcbeedan5mr1hkrxjo76kdf)).

rarely relocate them because of the costs and risk of structural damage.<sup>6</sup> Therefore, residents may have few if any options when faced with egregious rent increases, changes in lease terms, or other business decisions by community owners.<sup>7</sup>

More than four million manufactured homes in the United States are located in communities in which residents often own their homes but rent the land beneath them,<sup>8</sup> which can make residents particularly vulnerable to changes that the landowners may make. According to the *New York Times*, manufactured housing communities have been “ripe targets for investors, who buy communities and then increase the lot rents.”<sup>9</sup> Between 2023 and 2024, rents in these communities grew more than five times the pace of rent growth in traditional apartment buildings.<sup>10</sup> Since 2021 in Maine, for example, The BoaVida Group and Philips International have reportedly raised rents more than 50 percent in some communities.<sup>11</sup> Some firms highlight rent growth as part of their investment strategy; Patriot Holdings, one owner with multiple communities in New England, advertises that investors can expect “rent increases *in line* with market demand” – a demand it describes as “booming.”<sup>12</sup> In some cases, the potentially exploitative nature of such practices has drawn legal attention. In 2024, for example, Homes of America agreed to repay residents in West Virginia to settle claims related to an allegedly unlawful rent increase that residents described as “unconscionable and inequitable.”<sup>13</sup>

---

<sup>6</sup> *Id.*

<sup>7</sup> *PESP Private Equity Manufactured Housing Tracker*, *supra* note 1.

<sup>8</sup> Manufactured Housing Institute, *2022 Manufactured Housing Facts* (Aug. 2022) ([web.archive.org/web/20230529230808/www.manufacturedhousing.org/wp-content/uploads/2022/04/2022-MHI-Quick-Facts-updated-05-2022-2.pdf](https://web.archive.org/web/20230529230808/www.manufacturedhousing.org/wp-content/uploads/2022/04/2022-MHI-Quick-Facts-updated-05-2022-2.pdf)).

<sup>9</sup> *Residents of a Mobile Home Park Join Forces to Buy Their Community*, *New York Times* (Oct. 24, 2024) ([www.nytimes.com/2024/10/10/realestate/brunswick-mobile-home-sale-maine.html](https://www.nytimes.com/2024/10/10/realestate/brunswick-mobile-home-sale-maine.html)).

<sup>10</sup> Fannie Mae, *September 2024: Fundamentals at MHCs Remain Tight but Lending Volume Decline* (Sept. 2024) ([www.fanniemae.com/media/53321/display](https://www.fanniemae.com/media/53321/display)).

<sup>11</sup> Maine State Legislature Housing and Economic Development Committee, Testimony Submitted for the Record of Antoinette Rodrigues, *Hearing on An Act to Amend the Laws Governing Manufactured Housing Communities to Prevent Excessive Rent and Fees Increases*, 132nd Me. Leg., 1st Sess. (May 2, 2025); The Genesis Fund, *Mobile Home Communities in Maine and the United States* (Mar. 2025) ([genesisfund.org/wp-content/uploads/2025/04/FINAL-Maine-Mobile-Home-Community-Research-April-2025.pdf](https://genesisfund.org/wp-content/uploads/2025/04/FINAL-Maine-Mobile-Home-Community-Research-April-2025.pdf)).

<sup>12</sup> Patriot Holdings, *Patriot Investment Philosophy* ([www.patriotholdings.com/investment-philosophy](https://www.patriotholdings.com/investment-philosophy)) (accessed Aug. 6, 2025) (emphasis added).

<sup>13</sup> Health in Partnership, *Home Sick: Uncovering the Health Harms in Homes of America’s Manufactured Housing Communities* (May 6, 2025) ([www.healthinpartnership.org/resources/home-sick-uncovering-the-health-harms-in-homes-of-americas-manufactured-housing-communities](https://www.healthinpartnership.org/resources/home-sick-uncovering-the-health-harms-in-homes-of-americas-manufactured-housing-communities)).

In addition, investment firms have allegedly coordinated to raise rents in manufactured housing communities nationwide. For example, a 2023 complaint filed in federal court in Illinois against Sun Communities, among other parties, alleges that the firm exchanged non-public, competitively sensitive information with other community owners through a third-party analytics provider.<sup>14</sup> According to the complaint, this arrangement allowed the defendants “to increase manufactured home lot rents systematically and unlawfully.”<sup>15</sup> The complaint also notes that the rents exceeded both the rate of inflation and historical trends.<sup>16</sup> Attorneys general in Connecticut and Minnesota have also opened investigations into rent practices at investor-owned communities.<sup>17</sup>

Residents have also reported that certain investment firms neglect community maintenance and cause living conditions to deteriorate. In New Mexico, for example, one resident described Legacy Communities’ approach: “[T]he first thing they started doing was raising our rent, decreasing our property values by not keeping up the property, [and] firing all the staff that they had that knew how to keep up the property.”<sup>18</sup> Despite the firm’s claim that higher rents fund maintenance and improvements,<sup>19</sup> residents said that “their rent has gone up significantly while necessary fixes and upkeep have diminished.”<sup>20</sup> Residents of communities that the BoaVida Group and Philips International own in New England have raised similar concerns about poor community maintenance and, in some cases, health hazards.<sup>21</sup> Relatedly, a recent report on Homes of America communities found examples of serious neglect – including poor water quality and availability, pest infestations, and decaying infrastructure – that persisted for months and caused severe health impacts, including respiratory illnesses.<sup>22</sup>

---

<sup>14</sup> Class Action Complaint, *Hajek et al. v. DataComp Appraisal Systems, Inc.*, No. 23-cv-6715 (N.D. Ill. Oct. 31, 2023).

<sup>15</sup> *Id.*

<sup>16</sup> *Id.*

<sup>17</sup> *Id.*

<sup>18</sup> *Mobile Home Park Residents Hope New Ordinance Will Protect Them*, KOB 4 (Jan. 26, 2025) ([www.kob.com/news/top-news/mobile-home-park-residents-hope-new-ordinance-will-protect-them/](http://www.kob.com/news/top-news/mobile-home-park-residents-hope-new-ordinance-will-protect-them/)).

<sup>19</sup> Andrew Fells, President, Legacy Communities, *Statement from Andrew Fells, President, Legacy Communities* (Feb. 2024) ([www.kob.com/wp-content/uploads/2024/02/Statement-from-Legacy-Communities.pdf](http://www.kob.com/wp-content/uploads/2024/02/Statement-from-Legacy-Communities.pdf)).

<sup>20</sup> *Mobile Home Park Residents Hope New Ordinance Will Protect Them*, *supra* note 22.

<sup>21</sup> Antoinette Rodrigues, *supra* note 15; Maine State Legislature Housing and Economic Development Committee, Testimony Submitted for the Record of Missy Erving, *Hearing on An Act to Amend the Laws Governing Manufactured Housing Communities to Prevent Excessive Rent and Fees Increases*, 132nd Me. Leg., 1st Sess. (May 2, 2025).

<sup>22</sup> Health in Partnership, *supra* note 17.

Legal and procedural hurdles can complicate residents' efforts to challenge the types of issues described above. Residents in Homes of America communities, for example, have described a range of retaliatory strategies that the company has pursued to limit its legal exposure. In one example, residents in West Virginia alleged that Homes of America threatened to make their monthly rents "substantially higher" unless they signed releases "of all rights under [the West Virginia Manufactured House Act]." <sup>23</sup> In another example, Homes of America reportedly sued a resident for interfering with the company's "contractual relationship" with the community after she organized clinics to educate her neighbors about their rights. <sup>24</sup> At the same time, investment firms have reportedly created barriers to shield themselves from resident lawsuits. According to a study published in the *Journal of Affordable Housing*, some actors in the manufactured housing industry have used "onerous arbitration provisions" that can "augment [resident-plaintiffs'] costs and diminish their procedural protections." <sup>25</sup> Investment firms also "often hide behind multiple shell [companies]" that obscure community ownership and the proper party for residents to sue. <sup>26</sup> The Government Accountability Office has similarly found that "information is limited on who or what company owns manufactured housing communities." <sup>27</sup>

To aid Congress in understanding the impact of Philips International's business practices on residents of its manufactured housing communities, please provide responses to the following document and information requests. Unless otherwise specified, these requests cover the period of January 1, 2020, to the present:

1. Documents sufficient to show the ownership and organizational structure of Philips International;
2. Any reports or presentations (including slide decks) concerning the corporate strategies of Philips International or affiliated LLCs as they relate to manufactured housing communities and:
  - a. Rent increases;
  - b. Resident fees;
  - c. Operating cost management;
  - d. Capital expenditures;
  - e. Resident turnover;
  - f. Resident organizing activity;

---

<sup>23</sup> Class Action Counterclaim, *Steele et al. v. Elk View MHP LLC*, No. CC-28-2024-C-171 (Va. Cir. Ct. Mercer Cnty. 2024).

<sup>24</sup> *Vulture Wars: Alden Global Capital's Assault on Manufactured Housing Residents*, *supra* note 6.

<sup>25</sup> Amy J. Schmitz, *Promoting the Promise Manufactured Homes Provide for Affordable Housing*, *Journal of Affordable Housing and Community Development Law* (2004).

<sup>26</sup> Health in Partnership, *supra* note 17.

<sup>27</sup> Government Accountability Office, *supra* note 5.

- g. Community disposition;
  - h. The use of public financing, including from Fannie Mae or Freddie Mac; and
  - i. The use of tax incentives, including Opportunity Zones;
- 3. The number of manufactured homes, if any, Philips International or affiliated LLCs rent to residents while these entities do not hold title, broken down by ZIP code;
- 4. The number of manufactured homes, if any, Philips International or affiliated LLCs have demolished, broken down by ZIP code;
- 5. The number of manufactured housing communities, if any, Philips International or affiliated LLCs have disposed of, redeveloped, or otherwise changed the use of, broken down by ZIP code;
- 6. A list of all settlements of litigation, including the date and terms of the settlement and a summary of the plaintiff's claims, related to a potential violation of any federal or state laws or regulations during ownership or operation of a manufactured housing community by Philips International or affiliated LLCs;

For each community listed in Schedule A, please provide the following information:

- 7. Documents sufficient to show ownership and organizational structure of the community, including percent ownership by Philips International and related entities, management staff and their roles, and any changes to these arrangements over time;
- 8. Documents sufficient to show state and local licensing to operate the community;
- 9. Documents sufficient to show whether and how the community has been used as collateral in any financing obtained by Philips International or affiliated LLCs;
- 10. Documents sufficient to show any recapitalization or similar refinancing of the community by Philips International or affiliated LLCs;
- 11. All policies, procedures, and guidelines related to the following topics:
  - a. Setting and adjusting lot rents over time, including criteria and data sources considered; any software, tools, or third-party services used; and any references to market rates or competitor rents;
  - b. Rent-to-own-contracts;
  - c. Fees for home installation, late rent payments, utilities, amenities, services, the sale of a home by a resident, and the removal or relocation of a home from the community;
  - d. Eviction actions, including criteria that triggers action and notice requirements;

- e. Maintenance and community infrastructure repairs (e.g., staffing levels, plumbing, HVAC, pest control, road repairs, amenities, waste removal, and landscaping);
- f. Capital expenditures and the connection between these expenditures and increases in rent or fees; and
- g. Resident organizing activity (e.g., resident meetings and associations, class action cooperation, and engagement with policymakers and media);

12. Per month, covering the period of 365 days before the purchase date for the community to the present:

- a. Number of occupied and vacant homes;
- b. Number of residents;
- c. Number of homes owned by residents, under rent-to-own contracts, or rented to residents;
- d. Average lot rent;
- e. Total resident fees, broken down by fees for home installation, late rent payments, utilities, amenities, services, the sale of a home by a resident, and the removal or relocation of a home from the community;
- f. Total fees paid by an affiliated LLC, if any, that owns or operates the community;
- g. Total accounts receivable;
- h. Net income;
- i. Number of complaints filed by residents concerning the management or conditions of the community;
- j. Number of maintenance requests submitted by residents;
- k. Number of arbitration clauses, waivers, and releases presented to or signed by residents;
- l. Number of eviction notices issued, eviction actions filed, and eviction actions resulting in the removal of a resident;
- m. Number of demolished homes;
- n. Number of homes newly placed in the community;
- o. Itemized capital expenditures;
- p. Itemized maintenance costs;
- q. Itemized operating costs not categorized as capital expenditures or maintenance;
- r. Any reports or warnings received from federal, state, or local authorities concerning housing, building, and health code violations, as well as water quality reports;
- s. Documents sufficient to show the status of any corrective actions taken due to a code violation or report;
- t. Any reports or warnings from a federal, state, or local authority concerning the community's licensing status;

13. Standard lease agreements, arbitration clauses, waivers, releases, home financing agreements (including rent-to-own contracts), home financing promotional materials, and written rules for the community and residents;
14. A summary of each instance in which Philips International or an affiliated LLC offered a release of claims to a manufactured housing community resident, including information regarding:
  - a. The date the release was offered or signed;
  - b. The circumstances giving rise to the offer (e.g., ongoing litigation, rent dispute, lease agreement negotiation, resident complaint to management or third parties);
  - c. The claims or potential claims covered by the release; and
  - d. Any incentives offered to the resident in exchange for the release.

Please provide your responses as soon as possible but in no event later than January 5, 2026. If you have any questions related to this request, please contact [REDACTED] of the Committee staff at [REDACTED] or [REDACTED]. Please send any official correspondence relating to this request to [REDACTED].

Sincerely,



---

Margaret Wood Hassan  
Ranking Member

cc: David Schweikert  
Chairman, Joint Economic Committee

Eric Schmitt  
Vice Chairman, Joint Economic Committee

**Schedule A**

**1. Philips International**

- a. Pine Hill Mobile Home Court
  - 415 Thrasher Road, Claremont, NH 03743
- b. Rolling Acres
  - 36 Third Street, Mont Vernon, NH 03057
- c. Cocheco River Estates
  - 11 Tamarck Lane, Rochester, NH 03867



HOUSE OF REPRESENTATIVES

DAVID SCHWEIKERT, ARIZONA, CHAIRMAN  
JODEY C. ARRINGTON, TEXAS  
RON ESTES, KANSAS  
LLOYD K. SMUCKER, PENNSYLVANIA  
NICOLE MALLIOTAKIS, NEW YORK  
VICTORIA SPARTZ, INDIANA

DONALD S. BEYER JR., VIRGINIA  
GWEN MOORE, WISCONSIN  
SEAN CASTEN, ILLINOIS  
DAVE MIN, CALIFORNIA

RON DONADO, EXECUTIVE DIRECTOR

Congress of the United States

JOINT ECONOMIC COMMITTEE  
(CREATED PURSUANT TO SEC. 5(a) OF PUBLIC LAW 304, 79TH CONGRESS)

Washington, DC 20510-6602

SENATE

ERIC SCHMITT, MISSOURI, VICE CHAIRMAN  
TOM COTTON, ARKANSAS  
TED BUDD, NORTH CAROLINA  
DAVID MCCORMICK, PENNSYLVANIA  
MARSHA BLACKBURN, TENNESSEE  
ASHLEY MOODY, FLORIDA

MARGARET WOOD HASSAN, NEW HAMPSHIRE,  
RANKING MEMBER  
AMY KLOBUCHAR, MINNESOTA  
MARTIN HEINRICH, NEW MEXICO  
MARK KELLY, ARIZONA

LAURA EPSTEIN, DEMOCRATIC STAFF DIRECTOR

December 8, 2025

Jeremiah Boucher  
Founder & CEO  
Patriot Holdings  
4007 Dean Martin Drive  
Las Vegas, Nevada 89103

Dear Mr. Boucher:

I am writing to request information from Patriot Holdings regarding the impact of its business practices on manufactured housing communities in New England. An estimated 22 million Americans live in manufactured homes,<sup>1</sup> and in recent years, investment firms have increasingly purchased manufactured housing communities, with total estimated purchases as high as \$9.4 billion in 2021.<sup>2</sup> According to one June 2021 analysis, acquisitions by investment firms – including Patriot Holdings<sup>3</sup> – accounted for 23 percent of manufactured housing community sales over the previous two years.<sup>4</sup> Given this impact on our economy, public reports of concerns with the management of some manufactured home communities, and the pressing need to increase access to safe, reliable housing that people can afford, I seek more information on your business practices.

Residents of manufactured housing communities include significant numbers of seniors, people with disabilities, low-income families, and people who live in rural areas.<sup>5</sup> In addition, residents often have limited ability to move; homes can be difficult to resell, and homeowners

---

<sup>1</sup> Manufactured Housing Institute, Research and Data ([www.manufacturedhousing.org/home/research-data/](http://www.manufacturedhousing.org/home/research-data/)) (accessed July 7, 2025).

<sup>2</sup> Government Accountability Office, *Manufactured Housing: Further HUD Action is Needed to Increase Available Loan Products* (GAO-23-105615) (Sept. 26, 2023).

<sup>3</sup> Patriot Holdings states that “we control the real estate investing process end-to-end.” Patriot Holdings, About Us ([www.patriotholdings.com/about-us](http://www.patriotholdings.com/about-us)) (accessed December 4, 2028).

<sup>4</sup> *Investors Are Buying Mobile Home Parks. Residents Are Paying a Price*, New York Times (Mar. 27, 2022) ([www.nytimes.com/2022/03/27/us/mobile-home-park-ownership-costs.html](http://www.nytimes.com/2022/03/27/us/mobile-home-park-ownership-costs.html)).

<sup>5</sup> Legal Services Corporation, *Housing Insecurity in the United States and the Role of Legal Aid* (Mar. 22, 2023) ([lsc-live.box.com/s/vn8det0gmcbepedan5mr1hkrxjo76kdf](http://lsc-live.box.com/s/vn8det0gmcbepedan5mr1hkrxjo76kdf)).

rarely relocate them because of the costs and risk of structural damage.<sup>6</sup> Therefore, residents may have few if any options when faced with egregious rent increases, changes in lease terms, or other business decisions by community owners.<sup>7</sup>

More than four million manufactured homes in the United States are located in communities in which residents often own their homes but rent the land beneath them,<sup>8</sup> which can make residents particularly vulnerable to changes that the landowners may make. According to the *New York Times*, manufactured housing communities have been “ripe targets for investors, who buy communities and then increase the lot rents.”<sup>9</sup> Between 2023 and 2024, rents in these communities grew more than five times the pace of rent growth in traditional apartment buildings.<sup>10</sup> Since 2021 in Maine, for example, The BoaVida Group and Philips International have reportedly raised rents more than 50 percent in some communities.<sup>11</sup> Some firms highlight rent growth as part of their investment strategy; Patriot Holdings, for example, advertises that investors can expect “rent increases *in line* with market demand” – a demand it describes as “booming.”<sup>12</sup> In some cases, the potentially exploitative nature of such practices has drawn legal attention. In 2024, for example, Homes of America agreed to repay residents in West Virginia to settle claims related to an allegedly unlawful rent increase that residents described as “unconscionable and inequitable.”<sup>13</sup>

---

<sup>6</sup> *Id.*

<sup>7</sup> *PESP Private Equity Manufactured Housing Tracker*, *supra* note 1.

<sup>8</sup> Manufactured Housing Institute, *2022 Manufactured Housing Facts* (Aug. 2022) ([web.archive.org/web/20230529230808/www.manufacturedhousing.org/wp-content/uploads/2022/04/2022-MHI-Quick-Facts-updated-05-2022-2.pdf](https://web.archive.org/web/20230529230808/www.manufacturedhousing.org/wp-content/uploads/2022/04/2022-MHI-Quick-Facts-updated-05-2022-2.pdf)).

<sup>9</sup> *Residents of a Mobile Home Park Join Forces to Buy Their Community*, *New York Times* (Oct. 24, 2024) ([www.nytimes.com/2024/10/10/realestate/brunswick-mobile-home-sale-maine.html](https://www.nytimes.com/2024/10/10/realestate/brunswick-mobile-home-sale-maine.html)).

<sup>10</sup> Fannie Mae, *September 2024: Fundamentals at MHCs Remain Tight but Lending Volume Decline* (Sept. 2024) ([www.fanniemae.com/media/53321/display](https://www.fanniemae.com/media/53321/display)).

<sup>11</sup> Maine State Legislature Housing and Economic Development Committee, Testimony Submitted for the Record of Antoinette Rodrigues, *Hearing on An Act to Amend the Laws Governing Manufactured Housing Communities to Prevent Excessive Rent and Fees Increases*, 132nd Me. Leg., 1st Sess. (May 2, 2025); The Genesis Fund, *Mobile Home Communities in Maine and the United States* (Mar. 2025) ([genesisfund.org/wp-content/uploads/2025/04/FINAL-Maine-Mobile-Home-Community-Research-April-2025.pdf](https://genesisfund.org/wp-content/uploads/2025/04/FINAL-Maine-Mobile-Home-Community-Research-April-2025.pdf)).

<sup>12</sup> Patriot Holdings, *Patriot Investment Philosophy* ([www.patriotholdings.com/investment-philosophy](https://www.patriotholdings.com/investment-philosophy)) (accessed Aug. 6, 2025) (emphasis added).

<sup>13</sup> Health in Partnership, *Home Sick: Uncovering the Health Harms in Homes of America’s Manufactured Housing Communities* (May 6, 2025) ([www.healthinpartnership.org/resources/home-sick-uncovering-the-health-harms-in-homes-of-americas-manufactured-housing-communities](https://www.healthinpartnership.org/resources/home-sick-uncovering-the-health-harms-in-homes-of-americas-manufactured-housing-communities)).

In addition, investment firms have allegedly coordinated to raise rents in manufactured housing communities nationwide. For example, a 2023 complaint filed in federal court in Illinois against Sun Communities, among other parties, alleges that the firm exchanged non-public, competitively sensitive information with other community owners through a third-party analytics provider.<sup>14</sup> According to the complaint, this arrangement allowed the defendants “to increase manufactured home lot rents systematically and unlawfully.”<sup>15</sup> The complaint also notes that the rents exceeded both the rate of inflation and historical trends.<sup>16</sup> Attorneys general in Connecticut and Minnesota have also opened investigations into rent practices at investor-owned communities.<sup>17</sup>

Residents have also reported that certain investment firms neglect community maintenance and cause living conditions to deteriorate. In New Mexico, for example, one resident described Legacy Communities’ approach: “[T]he first thing they started doing was raising our rent, decreasing our property values by not keeping up the property, [and] firing all the staff that they had that knew how to keep up the property.”<sup>18</sup> Despite the firm’s claim that higher rents fund maintenance and improvements,<sup>19</sup> residents said that “their rent has gone up significantly while necessary fixes and upkeep have diminished.”<sup>20</sup> Residents of communities that the BoaVida Group and Philips International own in New England have raised similar concerns about poor community maintenance and, in some cases, health hazards.<sup>21</sup> Relatedly, a recent report on Homes of America communities found examples of serious neglect – including poor water quality and availability, pest infestations, and decaying infrastructure – that persisted for months and caused severe health impacts, including respiratory illnesses.<sup>22</sup>

---

<sup>14</sup> Class Action Complaint, *Hajek et al. v. DataComp Appraisal Systems, Inc.*, No. 23-cv-6715 (N.D. Ill. Oct. 31, 2023).

<sup>15</sup> *Id.*

<sup>16</sup> *Id.*

<sup>17</sup> *Id.*

<sup>18</sup> *Mobile Home Park Residents Hope New Ordinance Will Protect Them*, KOB 4 (Jan. 26, 2025) ([www.kob.com/news/top-news/mobile-home-park-residents-hope-new-ordinance-will-protect-them/](http://www.kob.com/news/top-news/mobile-home-park-residents-hope-new-ordinance-will-protect-them/)).

<sup>19</sup> Andrew Fells, President, Legacy Communities, *Statement from Andrew Fells, President, Legacy Communities* (Feb. 2024) ([www.kob.com/wp-content/uploads/2024/02/Statement-from-Legacy-Communities.pdf](http://www.kob.com/wp-content/uploads/2024/02/Statement-from-Legacy-Communities.pdf)).

<sup>20</sup> *Mobile Home Park Residents Hope New Ordinance Will Protect Them*, *supra* note 22.

<sup>21</sup> Antoinette Rodrigues, *supra* note 15; Maine State Legislature Housing and Economic Development Committee, Testimony Submitted for the Record of Missy Erving, *Hearing on An Act to Amend the Laws Governing Manufactured Housing Communities to Prevent Excessive Rent and Fees Increases*, 132nd Me. Leg., 1st Sess. (May 2, 2025).

<sup>22</sup> Health in Partnership, *supra* note 17.

Legal and procedural hurdles can complicate residents' efforts to challenge the types of issues described above. Residents in Homes of America communities, for example, have described a range of retaliatory strategies that the company has pursued to limit its legal exposure. In one example, residents in West Virginia alleged that Homes of America threatened to make their monthly rents "substantially higher" unless they signed releases "of all rights under [the West Virginia Manufactured House Act]." <sup>23</sup> In another example, Homes of America reportedly sued a resident for interfering with the company's "contractual relationship" with the community after she organized clinics to educate her neighbors about their rights. <sup>24</sup> At the same time, investment firms have reportedly created barriers to shield themselves from resident lawsuits. According to a study published in the *Journal of Affordable Housing*, some actors in the manufactured housing industry have used "onerous arbitration provisions" that can "augment [resident-plaintiffs'] costs and diminish their procedural protections." <sup>25</sup> Investment firms also "often hide behind multiple shell [companies]" that obscure community ownership and the proper party for residents to sue. <sup>26</sup> The Government Accountability Office has similarly found that "information is limited on who or what company owns manufactured housing communities." <sup>27</sup>

To aid Congress in understanding the impact of Patriot Holdings's business practices on residents of its manufactured housing communities, please provide responses to the following document and information requests. Unless otherwise specified, these requests cover the period of January 1, 2020, to the present:

1. Documents sufficient to show the ownership and organizational structure of Patriot Holdings;
2. Any reports or presentations (including slide decks) concerning the corporate strategies of Patriot Holdings or affiliated LLCs as they relate to manufactured housing communities and:
  - a. Rent increases;
  - b. Resident fees;
  - c. Operating cost management;
  - d. Capital expenditures;
  - e. Resident turnover;
  - f. Resident organizing activity;

---

<sup>23</sup> Class Action Counterclaim, *Steele et al. v. Elk View MHP LLC*, No. CC-28-2024-C-171 (Va. Cir. Ct. Mercer Cnty. 2024).

<sup>24</sup> *Vulture Wars: Alden Global Capital's Assault on Manufactured Housing Residents*, *supra* note 6.

<sup>25</sup> Amy J. Schmitz, *Promoting the Promise Manufactured Homes Provide for Affordable Housing*, *Journal of Affordable Housing and Community Development Law* (2004).

<sup>26</sup> Health in Partnership, *supra* note 17.

<sup>27</sup> Government Accountability Office, *supra* note 5.

- g. Community disposition;
  - h. The use of public financing, including from Fannie Mae or Freddie Mac; and
  - i. The use of tax incentives, including Opportunity Zones;
- 3. The number of manufactured homes, if any, Patriot Holdings or affiliated LLCs rent to residents while these entities do not hold title, broken down by ZIP code;
- 4. The number of manufactured homes, if any, Patriot Holdings or affiliated LLCs have demolished, broken down by ZIP code;
- 5. The number of manufactured housing communities, if any, Patriot Holdings or affiliated LLCs have disposed of, redeveloped, or otherwise changed the use of, broken down by ZIP code;
- 6. A list of all settlements of litigation, including the date and terms of the settlement and a summary of the plaintiff's claims, related to a potential violation of any federal or state laws or regulations during ownership or operation of a manufactured housing community by Patriot Holdings or affiliated LLCs;

For each community listed in Schedule A, please provide the following information:

- 7. Documents sufficient to show ownership and organizational structure of the community, including percent ownership by Patriot Holdings and related entities, management staff and their roles, and any changes to these arrangements over time;
- 8. Documents sufficient to show state and local licensing to operate the community;
- 9. Documents sufficient to show whether and how the community has been used as collateral in any financing obtained by Patriot Holdings or affiliated LLCs;
- 10. Documents sufficient to show any recapitalization or similar refinancing of the community by Patriot Holdings or affiliated LLCs;
- 11. All policies, procedures, and guidelines related to the following topics:
  - a. Setting and adjusting lot rents over time, including criteria and data sources considered; any software, tools, or third-party services used; and any references to market rates or competitor rents;
  - b. Rent-to-own-contracts;
  - c. Fees for home installation, late rent payments, utilities, amenities, services, the sale of a home by a resident, and the removal or relocation of a home from the community;
  - d. Eviction actions, including criteria that triggers action and notice requirements;

- e. Maintenance and community infrastructure repairs (e.g., staffing levels, plumbing, HVAC, pest control, road repairs, amenities, waste removal, and landscaping);
- f. Capital expenditures and the connection between these expenditures and increases in rent or fees; and
- g. Resident organizing activity (e.g., resident meetings and associations, class action cooperation, and engagement with policymakers and media);

12. Per month, covering the period of 365 days before the purchase date for the community to the present:

- a. Number of occupied and vacant homes;
- b. Number of residents;
- c. Number of homes owned by residents, under rent-to-own contracts, or rented to residents;
- d. Average lot rent;
- e. Total resident fees, broken down by fees for home installation, late rent payments, utilities, amenities, services, the sale of a home by a resident, and the removal or relocation of a home from the community;
- f. Total fees paid by an affiliated LLC, if any, that owns or operates the community;
- g. Total accounts receivable;
- h. Net income;
- i. Number of complaints filed by residents concerning the management or conditions of the community;
- j. Number of maintenance requests submitted by residents;
- k. Number of arbitration clauses, waivers, and releases presented to or signed by residents;
- l. Number of eviction notices issued, eviction actions filed, and eviction actions resulting in the removal of a resident;
- m. Number of demolished homes;
- n. Number of homes newly placed in the community;
- o. Itemized capital expenditures;
- p. Itemized maintenance costs;
- q. Itemized operating costs not categorized as capital expenditures or maintenance;
- r. Any reports or warnings received from federal, state, or local authorities concerning housing, building, and health code violations, as well as water quality reports;
- s. Documents sufficient to show the status of any corrective actions taken due to a code violation or report;
- t. Any reports or warnings from a federal, state, or local authority concerning the community's licensing status;

Mr. Jeremiah Boucher

December 8, 2025

Page 7

13. Standard lease agreements, arbitration clauses, waivers, releases, home financing agreements (including rent-to-own contracts), home financing promotional materials, and written rules for the community and residents;
14. A summary of each instance in which Patriot Holdings or an affiliated LLC offered a release of claims to a manufactured housing community resident, including information regarding:
  - a. The date the release was offered or signed;
  - b. The circumstances giving rise to the offer (e.g., ongoing litigation, rent dispute, lease agreement negotiation, resident complaint to management or third parties);
  - c. The claims or potential claims covered by the release; and
  - d. Any incentives offered to the resident in exchange for the release.

Please provide your responses as soon as possible but in no event later than January 5, 2026. If you have any questions related to this request, please contact [REDACTED] of the Committee staff at [REDACTED] or [REDACTED]. Please send any official correspondence relating to this request to [REDACTED].

Sincerely,



---

Margaret Wood Hassan  
Ranking Member

cc: David Schweikert  
Chairman, Joint Economic Committee

Eric Schmitt  
Vice Chairman, Joint Economic Committee

**Schedule A**

**1. Patriot Holdings**

- a. Barrington Estates
  - 44 Estate Drive, Barrington, NH 03825
- b. Lancaster Estates
  - 00 Cubb Street, Lancaster, NH 03584
- c. Litchfield Estates
  - 13 Charles Bancroft Highway, Litchfield, NH 03052
- d. Pownal Estates
  - 45 Cardinal Boulevard, Pownal, VT 05261



HOUSE OF REPRESENTATIVES

DAVID SCHWEIKERT, ARIZONA, CHAIRMAN  
JODEY C. ARRINGTON, TEXAS  
RON ESTES, KANSAS  
LLOYD K. SMUCKER, PENNSYLVANIA  
NICOLE MALLIOTAKIS, NEW YORK  
VICTORIA SPARTZ, INDIANA

DONALD S. BEYER JR., VIRGINIA  
GWEN MOORE, WISCONSIN  
SEAN CASTEN, ILLINOIS  
DAVE MIN, CALIFORNIA

RON DONADO, EXECUTIVE DIRECTOR

Congress of the United States

JOINT ECONOMIC COMMITTEE  
(CREATED PURSUANT TO SEC. 5(a) OF PUBLIC LAW 304, 79TH CONGRESS)

Washington, DC 20510-6602

SENATE

ERIC SCHMITT, MISSOURI, VICE CHAIRMAN  
TOM COTTON, ARKANSAS  
TED BUDD, NORTH CAROLINA  
DAVID McCORMICK, PENNSYLVANIA  
MARSHA BLACKBURN, TENNESSEE  
ASHLEY MOODY, FLORIDA

MARGARET WOOD HASSAN, NEW HAMPSHIRE,  
RANKING MEMBER  
AMY KLOBUCHAR, MINNESOTA  
MARTIN HEINRICH, NEW MEXICO  
MARK KELLY, ARIZONA

LAURA EPSTEIN, DEMOCRATIC STAFF DIRECTOR

December 8, 2025

Patrick O'Malley  
Founder & CEO  
Legacy Communities  
8800 E. Raintree Drive, Suite 330  
Scottsdale, AZ 85260

Dear Mr. O'Malley:

I am writing to request information from Legacy Communities regarding the impact of its business practices on manufactured housing communities in New England. An estimated 22 million Americans live in manufactured homes,<sup>1</sup> and in recent years, investment firms have increasingly purchased manufactured housing communities, with total estimated purchases as high as \$9.4 billion in 2021.<sup>2</sup> According to one June 2021 analysis, acquisitions by investment firms – including Legacy Communities<sup>3</sup> – accounted for 23 percent of manufactured housing community sales over the previous two years.<sup>4</sup> Given this impact on our economy, public reports of concerns with the management of some manufactured home communities, and the pressing need to increase access to safe, reliable housing that people can afford, I seek more information on your business practices.

---

<sup>1</sup> Manufactured Housing Institute, Research and Data  
([www.manufacturedhousing.org/home/research-data/](http://www.manufacturedhousing.org/home/research-data/)) (accessed July 7, 2025).

<sup>2</sup> Government Accountability Office, *Manufactured Housing: Further HUD Action is Needed to Increase Available Loan Products* (GAO-23-105615) (Sept. 26, 2023).

<sup>3</sup> Legacy Communities has described itself as a “leading manufactured housing real estate investment & property management company.” Legacy Communities: *Leading Manufactured Housing Real Estate Investment & Property Management Company Announces Key Leadership Changes* (Jan. 16, 2024).

<sup>4</sup> *Investors Are Buying Mobile Home Parks. Residents Are Paying a Price*, New York Times (Mar. 27, 2022) ([www.nytimes.com/2022/03/27/us/mobile-home-park-ownership-costs.html](https://www.nytimes.com/2022/03/27/us/mobile-home-park-ownership-costs.html)).

Residents of manufactured housing communities include significant numbers of seniors, people with disabilities, low-income families, and people who live in rural areas.<sup>5</sup> In addition, residents often have limited ability to move; homes can be difficult to resell, and homeowners rarely relocate them because of the costs and risk of structural damage.<sup>6</sup> Therefore, residents may have few if any options when faced with egregious rent increases, changes in lease terms, or other business decisions by community owners.<sup>7</sup>

More than four million manufactured homes in the United States are located in communities in which residents often own their homes but rent the land beneath them,<sup>8</sup> which can make residents particularly vulnerable to changes that the landowners may make. According to the *New York Times*, manufactured housing communities have been “ripe targets for investors, who buy communities and then increase the lot rents.”<sup>9</sup> Between 2023 and 2024, rents in these communities grew more than five times the pace of rent growth in traditional apartment buildings.<sup>10</sup> Since 2021 in Maine, for example, The BoaVida Group and Philips International have reportedly raised rents more than 50 percent in some communities.<sup>11</sup> Some firms highlight rent growth as part of their investment strategy; Patriot Holdings, one owner with multiple communities in New England, advertises that investors can expect “rent increases *in line* with market demand” – a demand it describes as “booming.”<sup>12</sup> In some cases, the potentially exploitative nature of such practices has drawn legal attention. In 2024, for example, Homes of

---

<sup>5</sup> Legal Services Corporation, *Housing Insecurity in the United States and the Role of Legal Aid* (Mar. 22, 2023) ([lsc-live.box.com/s/vn8det0gmcbepeadan5mr1hkrxjo76kdf](https://lsc-live.box.com/s/vn8det0gmcbepeadan5mr1hkrxjo76kdf)).

<sup>6</sup> *Id.*

<sup>7</sup> *PESP Private Equity Manufactured Housing Tracker*, *supra* note 1.

<sup>8</sup> Manufactured Housing Institute, *2022 Manufactured Housing Facts* (Aug. 2022) ([web.archive.org/web/20230529230808/www.manufacturedhousing.org/wp-content/uploads/2022/04/2022-MHI-Quick-Facts-updated-05-2022-2.pdf](https://web.archive.org/web/20230529230808/www.manufacturedhousing.org/wp-content/uploads/2022/04/2022-MHI-Quick-Facts-updated-05-2022-2.pdf)).

<sup>9</sup> *Residents of a Mobile Home Park Join Forces to Buy Their Community*, *New York Times* (Oct. 24, 2024) ([www.nytimes.com/2024/10/10/realestate/brunswick-mobile-home-sale-maine.html](https://www.nytimes.com/2024/10/10/realestate/brunswick-mobile-home-sale-maine.html)).

<sup>10</sup> Fannie Mae, *September 2024: Fundamentals at MHCs Remain Tight but Lending Volume Decline* (Sept. 2024) ([www.fanniemae.com/media/53321/display](https://www.fanniemae.com/media/53321/display)).

<sup>11</sup> Maine State Legislature Housing and Economic Development Committee, Testimony Submitted for the Record of Antoinette Rodrigues, *Hearing on An Act to Amend the Laws Governing Manufactured Housing Communities to Prevent Excessive Rent and Fees Increases*, 132nd Me. Leg., 1st Sess. (May 2, 2025); The Genesis Fund, *Mobile Home Communities in Maine and the United States* (Mar. 2025) ([genesisfund.org/wp-content/uploads/2025/04/FINAL-Maine-Mobile-Home-Community-Research-April-2025.pdf](https://genesisfund.org/wp-content/uploads/2025/04/FINAL-Maine-Mobile-Home-Community-Research-April-2025.pdf)).

<sup>12</sup> Patriot Holdings, *Patriot Investment Philosophy* ([www.patriotholdings.com/investment-philosophy](https://www.patriotholdings.com/investment-philosophy)) (accessed Aug. 6, 2025) (emphasis added).

America agreed to repay residents in West Virginia to settle claims related to an allegedly unlawful rent increase that residents described as “unconscionable and inequitable.”<sup>13</sup>

In addition, investment firms have allegedly coordinated to raise rents in manufactured housing communities nationwide. For example, a 2023 complaint filed in federal court in Illinois against Sun Communities, among other parties, alleges that the firm exchanged non-public, competitively sensitive information with other community owners through a third-party analytics provider.<sup>14</sup> According to the complaint, this arrangement allowed the defendants “to increase manufactured home lot rents systematically and unlawfully.”<sup>15</sup> The complaint also notes that the rents exceeded both the rate of inflation and historical trends.<sup>16</sup> Attorneys general in Connecticut and Minnesota have also opened investigations into rent practices at investor-owned communities.<sup>17</sup>

Residents have also reported that certain investment firms neglect community maintenance and cause living conditions to deteriorate. In New Mexico, for example, one resident described Legacy Communities’ approach: “[T]he first thing they started doing was raising our rent, decreasing our property values by not keeping up the property, [and] firing all the staff that they had that knew how to keep up the property.”<sup>18</sup> Despite the firm’s claim that higher rents fund maintenance and improvements,<sup>19</sup> residents said that “their rent has gone up significantly while necessary fixes and upkeep have diminished.”<sup>20</sup> Residents of communities that the BoaVida Group and Philips International own in New England have raised similar concerns about poor community maintenance and, in some cases, health hazards.<sup>21</sup> Relatedly, a

---

<sup>13</sup> Health in Partnership, *Home Sick: Uncovering the Health Harms in Homes of America’s Manufactured Housing Communities* (May 6, 2025) ([www.healthinpartnership.org/resources/home-sick-uncovering-the-health-harms-in-homes-of-americas-manufactured-housing-communities](http://www.healthinpartnership.org/resources/home-sick-uncovering-the-health-harms-in-homes-of-americas-manufactured-housing-communities)).

<sup>14</sup> Class Action Complaint, *Hajek et al. v. DataComp Appraisal Systems, Inc.*, No. 23-cv-6715 (N.D. Ill. Oct. 31, 2023).

<sup>15</sup> *Id.*

<sup>16</sup> *Id.*

<sup>17</sup> *Id.*

<sup>18</sup> *Mobile Home Park Residents Hope New Ordinance Will Protect Them*, KOB 4 (Jan. 26, 2025) ([www.kob.com/news/top-news/mobile-home-park-residents-hope-new-ordinance-will-protect-them/](http://www.kob.com/news/top-news/mobile-home-park-residents-hope-new-ordinance-will-protect-them/)).

<sup>19</sup> Andrew Fells, President, Legacy Communities, *Statement from Andrew Fells, President, Legacy Communities* (Feb. 2024) ([www.kob.com/wp-content/uploads/2024/02/Statement-from-Legacy-Communities.pdf](http://www.kob.com/wp-content/uploads/2024/02/Statement-from-Legacy-Communities.pdf)).

<sup>20</sup> *Mobile Home Park Residents Hope New Ordinance Will Protect Them*, *supra* note 22.

<sup>21</sup> Antoinette Rodrigues, *supra* note 15; Maine State Legislature Housing and Economic Development Committee, Testimony Submitted for the Record of Missy Erving, *Hearing on An*

recent report on Homes of America communities found examples of serious neglect – including poor water quality and availability, pest infestations, and decaying infrastructure – that persisted for months and caused severe health impacts, including respiratory illnesses.<sup>22</sup>

Legal and procedural hurdles can complicate residents' efforts to challenge the types of issues described above. Residents in Homes of America communities, for example, have described a range of retaliatory strategies that the company has pursued to limit its legal exposure. In one example, residents in West Virginia alleged that Homes of America threatened to make their monthly rents "substantially higher" unless they signed releases "of all rights under [the West Virginia Manufactured House Act]."<sup>23</sup> In another example, Homes of America reportedly sued a resident for interfering with the company's "contractual relationship" with the community after she organized clinics to educate her neighbors about their rights.<sup>24</sup> At the same time, investment firms have reportedly created barriers to shield themselves from resident lawsuits. According to a study published in the *Journal of Affordable Housing*, some actors in the manufactured housing industry have used "onerous arbitration provisions" that can "augment [resident-plaintiffs'] costs and diminish their procedural protections."<sup>25</sup> Investment firms also "often hide behind multiple shell [companies]" that obscure community ownership and the proper party for residents to sue.<sup>26</sup> The Government Accountability Office has similarly found that "information is limited on who or what company owns manufactured housing communities."<sup>27</sup>

To aid Congress in understanding the impact of Legacy Communities's business practices on residents of its manufactured housing communities, please provide responses to the following document and information requests. Unless otherwise specified, these requests cover the period of January 1, 2020, to the present:

1. Documents sufficient to show the ownership and organizational structure of Legacy Communities;

---

*Act to Amend the Laws Governing Manufactured Housing Communities to Prevent Excessive Rent and Fees Increases*, 132nd Me. Leg., 1st Sess. (May 2, 2025).

<sup>22</sup> Health in Partnership, *supra* note 17.

<sup>23</sup> Class Action Counterclaim, *Steele et al. v. Elk View MHP LLC*, No. CC-28-2024-C-171 (Va. Cir. Ct. Mercer Cnty. 2024).

<sup>24</sup> *Vulture Wars: Alden Global Capital's Assault on Manufactured Housing Residents*, *supra* note 6.

<sup>25</sup> Amy J. Schmitz, *Promoting the Promise Manufactured Homes Provide for Affordable Housing*, *Journal of Affordable Housing and Community Development Law* (2004).

<sup>26</sup> Health in Partnership, *supra* note 17.

<sup>27</sup> Government Accountability Office, *supra* note 5.

2. Any reports or presentations (including slide decks) concerning the corporate strategies of Legacy Communities or affiliated LLCs as they relate to manufactured housing communities and:
  - a. Rent increases;
  - b. Resident fees;
  - c. Operating cost management;
  - d. Capital expenditures;
  - e. Resident turnover;
  - f. Resident organizing activity;
  - g. Community disposition;
  - h. The use of public financing, including from Fannie Mae or Freddie Mac; and
  - i. The use of tax incentives, including Opportunity Zones;
3. The number of manufactured homes, if any, Legacy Communities or affiliated LLCs rent to residents while these entities do not hold title, broken down by ZIP code;
4. The number of manufactured homes, if any, Legacy Communities or affiliated LLCs have demolished, broken down by ZIP code;
5. The number of manufactured housing communities, if any, Legacy Communities or affiliated LLCs have disposed of, redeveloped, or otherwise changed the use of, broken down by ZIP code;
6. A list of all settlements of litigation, including the date and terms of the settlement and a summary of the plaintiff's claims, related to a potential violation of any federal or state laws or regulations during ownership or operation of a manufactured housing community by Legacy Communities or affiliated LLCs;

For each community listed in Schedule A, please provide the following information:

7. Documents sufficient to show ownership and organizational structure of the community, including percent ownership by Legacy Communities and related entities, management staff and their roles, and any changes to these arrangements over time;
8. Documents sufficient to show state and local licensing to operate the community;
9. Documents sufficient to show whether and how the community has been used as collateral in any financing obtained by Legacy Communities or affiliated LLCs;
10. Documents sufficient to show any recapitalization or similar refinancing of the community by Legacy Communities or affiliated LLCs;
11. All policies, procedures, and guidelines related to the following topics:

- a. Setting and adjusting lot rents over time, including criteria and data sources considered; any software, tools, or third-party services used; and any references to market rates or competitor rents;
  - b. Rent-to-own-contracts;
  - c. Fees for home installation, late rent payments, utilities, amenities, services, the sale of a home by a resident, and the removal or relocation of a home from the community;
  - d. Eviction actions, including criteria that triggers action and notice requirements;
  - e. Maintenance and community infrastructure repairs (e.g., staffing levels, plumbing, HVAC, pest control, road repairs, amenities, waste removal, and landscaping);
  - f. Capital expenditures and the connection between these expenditures and increases in rent or fees; and
  - g. Resident organizing activity (e.g., resident meetings and associations, class action cooperation, and engagement with policymakers and media);
12. Per month, covering the period of 365 days before the purchase date for the community to the present:
- a. Number of occupied and vacant homes;
  - b. Number of residents;
  - c. Number of homes owned by residents, under rent-to-own contracts, or rented to residents;
  - d. Average lot rent;
  - e. Total resident fees, broken down by fees for home installation, late rent payments, utilities, amenities, services, the sale of a home by a resident, and the removal or relocation of a home from the community;
  - f. Total fees paid by an affiliated LLC, if any, that owns or operates the community;
  - g. Total accounts receivable;
  - h. Net income;
  - i. Number of complaints filed by residents concerning the management or conditions of the community;
  - j. Number of maintenance requests submitted by residents;
  - k. Number of arbitration clauses, waivers, and releases presented to or signed by residents;
  - l. Number of eviction notices issued, eviction actions filed, and eviction actions resulting in the removal of a resident;
  - m. Number of demolished homes;
  - n. Number of homes newly placed in the community;
  - o. Itemized capital expenditures;
  - p. Itemized maintenance costs;
  - q. Itemized operating costs not categorized as capital expenditures or maintenance;

- r. Any reports or warnings received from federal, state, or local authorities concerning housing, building, and health code violations, as well as water quality reports;
  - s. Documents sufficient to show the status of any corrective actions taken due to a code violation or report;
  - t. Any reports or warnings from a federal, state, or local authority concerning the community's licensing status;
13. Standard lease agreements, arbitration clauses, waivers, releases, home financing agreements (including rent-to-own contracts), home financing promotional materials, and written rules for the community and residents;
14. A summary of each instance in which Legacy Communities or an affiliated LLC offered a release of claims to a manufactured housing community resident, including information regarding:
- a. The date the release was offered or signed;
  - b. The circumstances giving rise to the offer (e.g., ongoing litigation, rent dispute, lease agreement negotiation, resident complaint to management or third parties);
  - c. The claims or potential claims covered by the release; and
  - d. Any incentives offered to the resident in exchange for the release.

Please provide your responses as soon as possible but in no event later than January 5, 2026. If you have any questions related to this request, please contact [REDACTED] of the Committee staff at [REDACTED] or [REDACTED]. Please send any official correspondence relating to this request to [REDACTED].

Sincerely,



---

Margaret Wood Hassan  
Ranking Member

cc: David Schweikert  
Chairman, Joint Economic Committee

Eric Schmitt  
Vice Chairman, Joint Economic Committee

**Schedule A**

**1. Legacy Communities**

- a. Bay Bridge Estates
  - 2 Primrose Lane, Brunswick, ME 04011
- b. Red Wing Estates
  - 2900 Cranberry Highway, East Wareham, MA 02538



## HOUSE OF REPRESENTATIVES

DAVID SCHWEIKERT, ARIZONA, CHAIRMAN  
JODEY C. ARRINGTON, TEXAS  
RON ESTES, KANSAS  
LLOYD K. SMUCKER, PENNSYLVANIA  
NICOLE MALLIOTAKIS, NEW YORK  
VICTORIA SPARTZ, INDIANA

DONALD S. BEYER JR., VIRGINIA  
GWEN MOORE, WISCONSIN  
SEAN CASTEN, ILLINOIS  
DAVE MIN, CALIFORNIA

RON DONADO, EXECUTIVE DIRECTOR

## Congress of the United States

JOINT ECONOMIC COMMITTEE  
(CREATED PURSUANT TO SEC. 5(a) OF PUBLIC LAW 304, 79TH CONGRESS)

Washington, DC 20510-6602

## SENATE

ERIC SCHMITT, MISSOURI, VICE CHAIRMAN  
TOM COTTON, ARKANSAS  
TED BUDD, NORTH CAROLINA  
DAVID MCCORMICK, PENNSYLVANIA  
MARSHA BLACKBURN, TENNESSEE  
ASHLEY MOODY, FLORIDA

MARGARET WOOD HASSAN, NEW HAMPSHIRE,  
RANKING MEMBER  
AMY KLOBUCHAR, MINNESOTA  
MARTIN HEINRICH, NEW MEXICO  
MARK KELLY, ARIZONA

LAURA EPSTEIN, DEMOCRATIC STAFF DIRECTOR

December 8, 2025

Heath Freeman  
President  
Alden Global Capital  
885 3rd Ave #34  
New York, NY 10022

Dear Mr. Freeman:

I am writing to request information from Homes of America regarding the impact of its business practices on manufactured housing communities in New England. An estimated 22 million Americans live in manufactured homes,<sup>1</sup> and in recent years, investment firms have increasingly purchased manufactured housing communities, with total estimated purchases as high as \$9.4 billion in 2021.<sup>2</sup> According to one June 2021 analysis, acquisitions by investment firms – including Alden Global Capital, the owner of Homes of America<sup>3</sup> – accounted for 23 percent of manufactured housing community sales over the previous two years.<sup>4</sup> Given this impact on our economy, public reports of concerns with the management of some manufactured home communities, and the pressing need to increase access to safe, reliable housing that people can afford, I seek more information on your business practices.

---

<sup>1</sup> Manufactured Housing Institute, Research and Data ([www.manufacturedhousing.org/home/research-data/](http://www.manufacturedhousing.org/home/research-data/)) (accessed July 7, 2025).

<sup>2</sup> Government Accountability Office, *Manufactured Housing: Further HUD Action is Needed to Increase Available Loan Products* (GAO-23-105615) (Sept. 26, 2023).

<sup>3</sup> Public reporting has called Homes of America an affiliate or subsidiary of Alden Global Capital. E.g., Private Equity Stakeholder Project, *Vulture Wars: Alden Global Capital's Assault on Manufactured Housing Residents* (Sept. 2024) ([pestakeholder.org/reports/vulture-wars-alden-global-capitals-assault-on-manufactured-housing-residents/](https://pestakeholder.org/reports/vulture-wars-alden-global-capitals-assault-on-manufactured-housing-residents/)); *Private Equity Is Turning Mobile Homes into Health Hazards. What Can Governments Do?*, Boston 25 News (May 31, 2025) ([www.boston25news.com/news/private-equity-is-turning-mobile-homes-into-health-hazards-what-can-governments-do/GCUGFZP4BZMA5CG64TXBCCDPVQ/](https://www.boston25news.com/news/private-equity-is-turning-mobile-homes-into-health-hazards-what-can-governments-do/GCUGFZP4BZMA5CG64TXBCCDPVQ/)).

<sup>4</sup> *Investors Are Buying Mobile Home Parks. Residents Are Paying a Price*, New York Times (Mar. 27, 2022) ([www.nytimes.com/2022/03/27/us/mobile-home-park-ownership-costs.html](https://www.nytimes.com/2022/03/27/us/mobile-home-park-ownership-costs.html)).

Residents of manufactured housing communities include significant numbers of seniors, people with disabilities, low-income families, and people who live in rural areas.<sup>5</sup> In addition, residents often have limited ability to move; homes can be difficult to resell, and homeowners rarely relocate them because of the costs and risk of structural damage.<sup>6</sup> Therefore, residents may have few if any options when faced with egregious rent increases, changes in lease terms, or other business decisions by community owners.<sup>7</sup>

More than four million manufactured homes in the United States are located in communities in which residents often own their homes but rent the land beneath them,<sup>8</sup> which can make residents particularly vulnerable to changes that the landowners may make. According to the *New York Times*, manufactured housing communities have been “ripe targets for investors, who buy communities and then increase the lot rents.”<sup>9</sup> Between 2023 and 2024, rents in these communities grew more than five times the pace of rent growth in traditional apartment buildings.<sup>10</sup> Since 2021 in Maine, for example, The BoaVida Group and Philips International have reportedly raised rents more than 50 percent in some communities.<sup>11</sup> Some firms highlight rent growth as part of their investment strategy; Patriot Holdings, one owner with multiple communities in New England, advertises that investors can expect “rent increases *in line* with market demand” – a demand it describes as “booming.”<sup>12</sup> In some cases, the potentially exploitative nature of such practices has drawn legal attention. In 2024, for example, Homes of

---

<sup>5</sup> Legal Services Corporation, *Housing Insecurity in the United States and the Role of Legal Aid* (Mar. 22, 2023) ([lsc-live.box.com/s/vn8det0gmcbeedan5mr1hkrxjo76kdf](https://lsc-live.box.com/s/vn8det0gmcbeedan5mr1hkrxjo76kdf)).

<sup>6</sup> *Id.*

<sup>7</sup> *PESP Private Equity Manufactured Housing Tracker*, *supra* note 1.

<sup>8</sup> Manufactured Housing Institute, *2022 Manufactured Housing Facts* (Aug. 2022) ([web.archive.org/web/20230529230808/www.manufacturedhousing.org/wp-content/uploads/2022/04/2022-MHI-Quick-Facts-updated-05-2022-2.pdf](https://web.archive.org/web/20230529230808/www.manufacturedhousing.org/wp-content/uploads/2022/04/2022-MHI-Quick-Facts-updated-05-2022-2.pdf)).

<sup>9</sup> *Residents of a Mobile Home Park Join Forces to Buy Their Community*, *New York Times* (Oct. 24, 2024) ([www.nytimes.com/2024/10/10/realestate/brunswick-mobile-home-sale-maine.html](https://www.nytimes.com/2024/10/10/realestate/brunswick-mobile-home-sale-maine.html)).

<sup>10</sup> Fannie Mae, *September 2024: Fundamentals at MHCs Remain Tight but Lending Volume Decline* (Sept. 2024) ([www.fanniemae.com/media/53321/display](https://www.fanniemae.com/media/53321/display)).

<sup>11</sup> Maine State Legislature Housing and Economic Development Committee, Testimony Submitted for the Record of Antoinette Rodrigues, *Hearing on An Act to Amend the Laws Governing Manufactured Housing Communities to Prevent Excessive Rent and Fees Increases*, 132nd Me. Leg., 1st Sess. (May 2, 2025); The Genesis Fund, *Mobile Home Communities in Maine and the United States* (Mar. 2025) ([genesisfund.org/wp-content/uploads/2025/04/FINAL-Maine-Mobile-Home-Community-Research-April-2025.pdf](https://genesisfund.org/wp-content/uploads/2025/04/FINAL-Maine-Mobile-Home-Community-Research-April-2025.pdf)).

<sup>12</sup> Patriot Holdings, *Patriot Investment Philosophy* ([www.patriotholdings.com/investment-philosophy](https://www.patriotholdings.com/investment-philosophy)) (accessed Aug. 6, 2025) (emphasis added).

America agreed to repay residents in West Virginia to settle claims related to an allegedly unlawful rent increase that residents described as “unconscionable and inequitable.”<sup>13</sup>

In addition, investment firms have allegedly coordinated to raise rents in manufactured housing communities nationwide. For example, a 2023 complaint filed in federal court in Illinois against Sun Communities, among other parties, alleges that the firm exchanged non-public, competitively sensitive information with other community owners through a third-party analytics provider.<sup>14</sup> According to the complaint, this arrangement allowed the defendants “to increase manufactured home lot rents systematically and unlawfully.”<sup>15</sup> The complaint also notes that the rents exceeded both the rate of inflation and historical trends.<sup>16</sup> Attorneys general in Connecticut and Minnesota have also opened investigations into rent practices at investor-owned communities.<sup>17</sup>

Residents have also reported that certain investment firms neglect community maintenance and cause living conditions to deteriorate. In New Mexico, for example, one resident described Legacy Communities’ approach: “[T]he first thing they started doing was raising our rent, decreasing our property values by not keeping up the property, [and] firing all the staff that they had that knew how to keep up the property.”<sup>18</sup> Despite the firm’s claim that higher rents fund maintenance and improvements,<sup>19</sup> residents said that “their rent has gone up significantly while necessary fixes and upkeep have diminished.”<sup>20</sup> Residents of communities that the BoaVida Group and Philips International own in New England have raised similar concerns about poor community maintenance and, in some cases, health hazards.<sup>21</sup> Relatedly, a

---

<sup>13</sup> Health in Partnership, *Home Sick: Uncovering the Health Harms in Homes of America’s Manufactured Housing Communities* (May 6, 2025) ([www.healthinpartnership.org/resources/home-sick-uncovering-the-health-harms-in-homes-of-americas-manufactured-housing-communities](http://www.healthinpartnership.org/resources/home-sick-uncovering-the-health-harms-in-homes-of-americas-manufactured-housing-communities)).

<sup>14</sup> Class Action Complaint, *Hajek et al. v. DataComp Appraisal Systems, Inc.*, No. 23-cv-6715 (N.D. Ill. Oct. 31, 2023).

<sup>15</sup> *Id.*

<sup>16</sup> *Id.*

<sup>17</sup> *Id.*

<sup>18</sup> *Mobile Home Park Residents Hope New Ordinance Will Protect Them*, KOB 4 (Jan. 26, 2025) ([www.kob.com/news/top-news/mobile-home-park-residents-hope-new-ordinance-will-protect-them/](http://www.kob.com/news/top-news/mobile-home-park-residents-hope-new-ordinance-will-protect-them/)).

<sup>19</sup> Andrew Fells, President, Legacy Communities, *Statement from Andrew Fells, President, Legacy Communities* (Feb. 2024) ([www.kob.com/wp-content/uploads/2024/02/Statement-from-Legacy-Communities.pdf](http://www.kob.com/wp-content/uploads/2024/02/Statement-from-Legacy-Communities.pdf)).

<sup>20</sup> *Mobile Home Park Residents Hope New Ordinance Will Protect Them*, *supra* note 22.

<sup>21</sup> Antoinette Rodrigues, *supra* note 15; Maine State Legislature Housing and Economic Development Committee, Testimony Submitted for the Record of Missy Erving, *Hearing on An*

recent report on Homes of America communities found examples of serious neglect – including poor water quality and availability, pest infestations, and decaying infrastructure – that persisted for months and caused severe health impacts, including respiratory illnesses.<sup>22</sup>

Legal and procedural hurdles can complicate residents’ efforts to challenge the types of issues described above. Residents in Homes of America communities, for example, have described a range of retaliatory strategies that the company has pursued to limit its legal exposure. In one example, residents in West Virginia alleged that Homes of America threatened to make their monthly rents “substantially higher” unless they signed releases “of all rights under [the West Virginia Manufactured House Act].”<sup>23</sup> In another example, Homes of America reportedly sued a resident for interfering with the company’s “contractual relationship” with the community after she organized clinics to educate her neighbors about their rights.<sup>24</sup> At the same time, investment firms have reportedly created barriers to shield themselves from resident lawsuits. According to a study published in the *Journal of Affordable Housing*, some actors in the manufactured housing industry have used “onerous arbitration provisions” that can “augment [resident-plaintiffs’] costs and diminish their procedural protections.”<sup>25</sup> Investment firms also “often hide behind multiple shell [companies]” that obscure community ownership and the proper party for residents to sue.<sup>26</sup> The Government Accountability Office has similarly found that “information is limited on who or what company owns manufactured housing communities.”<sup>27</sup>

To aid Congress in understanding the impact of Homes of America’s business practices on residents of its manufactured housing communities, please provide responses to the following document and information requests. Unless otherwise specified, these requests cover the period of January 1, 2020, to the present:

1. Documents sufficient to show the ownership and organizational structure of Homes of America, including percent ownership by Alden Global Capital and related entities;

---

*Act to Amend the Laws Governing Manufactured Housing Communities to Prevent Excessive Rent and Fees Increases*, 132nd Me. Leg., 1st Sess. (May 2, 2025).

<sup>22</sup> Health in Partnership, *supra* note 17.

<sup>23</sup> Class Action Counterclaim, *Steele et al. v. Elk View MHP LLC*, No. CC-28-2024-C-171 (Va. Cir. Ct. Mercer Cnty. 2024).

<sup>24</sup> *Vulture Wars: Alden Global Capital’s Assault on Manufactured Housing Residents*, *supra* note 6.

<sup>25</sup> Amy J. Schmitz, *Promoting the Promise Manufactured Homes Provide for Affordable Housing*, *Journal of Affordable Housing and Community Development Law* (2004).

<sup>26</sup> Health in Partnership, *supra* note 17.

<sup>27</sup> Government Accountability Office, *supra* note 5.

2. Any reports or presentations (including slide decks) concerning the corporate strategies of Homes of America, Alden Global Capital, or affiliated LLCs as they relate to manufactured housing communities and:
  - a. Rent increases;
  - b. Resident fees;
  - c. Operating cost management;
  - d. Capital expenditures;
  - e. Resident turnover;
  - f. Resident organizing activity;
  - g. Community disposition;
  - h. The use of public financing, including from Fannie Mae or Freddie Mac; and
  - i. The use of tax incentives, including Opportunity Zones;
3. The number of manufactured homes, if any, Homes of America, Alden Global Capital, or affiliated LLCs rent to residents while these entities do not hold title, broken down by ZIP code;
4. The number of manufactured homes, if any, Homes of America, Alden Global Capital, or affiliated LLCs have demolished, broken down by ZIP code;
5. The number of manufactured housing communities, if any, Homes of America, Alden Global Capital, or affiliated LLCs have disposed of, redeveloped, or otherwise changed the use of, broken down by ZIP code;
6. A list of all settlements of litigation, including the date and terms of the settlement and a summary of the plaintiff's claims, related to a potential violation of any federal or state laws or regulations during ownership or operation of a manufactured housing community by Homes of America, Alden Global Capital, or affiliated LLCs;

For each community listed in Schedule A, please provide the following information:

7. Documents sufficient to show ownership and organizational structure of the community, including percent ownership by Homes of America, Alden Global Capital, and related entities, management staff and their roles, and any changes to these arrangements over time;
8. Documents sufficient to show state and local licensing to operate the community;
9. Documents sufficient to show whether and how the community has been used as collateral in any financing obtained by Homes of America, Alden Global Capital, or affiliated LLCs;
10. Documents sufficient to show any recapitalization or similar refinancing of the community by Homes of America, Alden Global Capital, or affiliated LLCs;

11. All policies, procedures, and guidelines related to the following topics:
  - a. Setting and adjusting lot rents over time, including criteria and data sources considered; any software, tools, or third-party services used; and any references to market rates or competitor rents;
  - b. Rent-to-own-contracts;
  - c. Fees for home installation, late rent payments, utilities, amenities, services, the sale of a home by a resident, and the removal or relocation of a home from the community;
  - d. Eviction actions, including criteria that triggers action and notice requirements;
  - e. Maintenance and community infrastructure repairs (e.g., staffing levels, plumbing, HVAC, pest control, road repairs, amenities, waste removal, and landscaping);
  - f. Capital expenditures and the connection between these expenditures and increases in rent or fees; and
  - g. Resident organizing activity (e.g., resident meetings and associations, class action cooperation, and engagement with policymakers and media);
12. Per month, covering the period of 365 days before the purchase date for the community to the present:
  - a. Number of occupied and vacant homes;
  - b. Number of residents;
  - c. Number of homes owned by residents, under rent-to-own contracts, or rented to residents;
  - d. Average lot rent;
  - e. Total resident fees, broken down by fees for home installation, late rent payments, utilities, amenities, services, the sale of a home by a resident, and the removal or relocation of a home from the community;
  - f. Total fees paid by an affiliated LLC, if any, that owns or operates the community;
  - g. Total accounts receivable;
  - h. Net income;
  - i. Number of complaints filed by residents concerning the management or conditions of the community;
  - j. Number of maintenance requests submitted by residents;
  - k. Number of arbitration clauses, waivers, and releases presented to or signed by residents;
  - l. Number of eviction notices issued, eviction actions filed, and eviction actions resulting in the removal of a resident;
  - m. Number of demolished homes;
  - n. Number of homes newly placed in the community;
  - o. Itemized capital expenditures;
  - p. Itemized maintenance costs;
  - q. Itemized operating costs not categorized as capital expenditures or maintenance;

- r. Any reports or warnings received from federal, state, or local authorities concerning housing, building, and health code violations, as well as water quality reports;
  - s. Documents sufficient to show the status of any corrective actions taken due to a code violation or report;
  - t. Any reports or warnings from a federal, state, or local authority concerning the community's licensing status;
13. Standard lease agreements, arbitration clauses, waivers, releases, home financing agreements (including rent-to-own contracts), home financing promotional materials, and written rules for the community and residents;
14. A summary of each instance in which Homes of America, Alden Global Capital, or an affiliated LLC offered a release of claims to a manufactured housing community resident, including information regarding:
- a. The date the release was offered or signed;
  - b. The circumstances giving rise to the offer (e.g., ongoing litigation, rent dispute, lease agreement negotiation, resident complaint to management or third parties);
  - c. The claims or potential claims covered by the release; and
  - d. Any incentives offered to the resident in exchange for the release.

Please provide your responses as soon as possible but in no event later than January 5, 2026. If you have any questions related to this request, please contact [REDACTED] of the Committee staff at [REDACTED] or [REDACTED]. Please send any official correspondence relating to this request to [REDACTED].

Sincerely,



---

Margaret Wood Hassan  
Ranking Member

cc: David Schweikert  
Chairman, Joint Economic Committee

Eric Schmitt  
Vice Chairman, Joint Economic Committee

**Schedule A**

**1. Homes of America**

- a. Evergreen Terrace
  - Silver Street, Clinton, ME 04927
- b. Pine View Park
  - 499 August Road, Winslow, ME 04901