

Manufactured Housing Association for Regulatory Reform

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VIA FEDERAL EXPRESS

Ms. Maren Kasper HUD-White House Liaison U.S. Department of Housing and Urban Development 451 7th Street, S.W. Washington, D.C. 20410

Re: Continuing Abuses Within the HUD Manufactured Housing Program

Dear Ms. Kasper:

We find it utterly astounding and appalling that HUD, under the leadership of the Trump Administration and Secretary Carson, has seen fit not only to allow the federal manufactured housing program to remain under the control of an Obama Administration holdover, Pamela Danner, but has now allowed her to hire, as a "Management Analyst" within that program, Ms. Lois Starkey, the former Manufactured Housing Institute (MHI) Vice President for Regulatory Affairs -- an Obama political donor herself, as shown by public contribution records (see, copy attached), a registered federal lobbyist representing (as part of her employment by MHI) the industry's largest corporate conglomerates (including Clayton Homes, Inc., owned by Berkshire Hathaway Corporation mogul, and Obama supporter, Warren Buffet), and a key actor in HUD's 2014 hiring of Ms. Danner in the first place.

That the Trump Administration would be party to such an amazingly ill-considered, offensive and arguably scandalous action is not only a direct affront to the smaller industry businesses struggling to survive the malign administration of Ms. Danner – which has seen a continual expansion and intensification of unnecessary and destructive federal regulation, to the advantage and benefit of the industry's crony capitalist conglomerates, program contractors and industry competitors – but is directly contrary to president trump's own pledge to "drain the swamp" in Washington, D.C., as well as official Trump Administration policies and Executive Orders regarding: (1) regulatory reform within the federal government; (2) support for the nation's small businesses (see, Presidential Proclamation dated May 31, 2017); and (3) government restructuring.

HUD's continuing failure, thus far, to re-assign and replace Ms. Danner – combined now with allowing her to bring personal allies into the program as career employees – effectively discriminates against manufactured housing as a comprehensively federally-regulated industry

(and particularly its smaller, independent businesses), as well as its mostly moderate and lower-income homebuyers, by leaving in place a program Administrator (and other personnel) who have – and will continue to – defy and resist President Trump's regulatory reform policies, thereby denying smaller industry businesses and consumers the substantial benefits of those policies.

Accordingly, we hereby ask that you provide us with copies of the job vacancy announcement for this position (if any), as well as evidence of where and for how long that announcement (if any) was posted, the response period for that announcement (if any), the number of applications received by HUD for this position, and the name and title of any Trump Administration appointee or official who reviewed and/or approved the hiring of Ms. Starkey. We also ask that you state whether this action was subject to any ethics review within or outside of HUD (based on Ms. Starkey's status as a registered federal lobbyist and her access to manufactured housing industry proprietary and confidential information and government relations strategies as a result of her immediately-prior employment by MHI for multiple years), and that you provide MHARR with any evidence of that review (if any).

Based on this most recent matter, added to the numerous reasons that we have already provided you regarding the urgent need for a new manufactured housing program administrator, we further ask that HUD begin the process of reforming the federal manufactured housing program, beginning with the re-assignment and replacement of the current program administrator.

Sincerely,

Mark Weiss

President and CEO

cc: Hon. Paul Compton, Esq. Ms. Sheila Greenwood Mr. Rick Dearborn

Mr. Stephen Miller