





Displacement, Inc.

How Havenpark Capital and Enterprise Community Partners are eroding affordable housing and how residents are fighting back



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"Home is where my family and I should feel safe and secure. Home is where we can come together and enjoy one another's company, where we can laugh and tell jokes, where we put together a barbecue in the warm weather and share our love for one another. I've been in my home for the past 17 years with great memories — helping my daughter raise my four grandchildren, seeing them grow every day. Family memories take place in our home, and they are worth a lifetime."



- Ann Jenkins, Spring Valley Mobile Village, New Windsor, New York

FOREWORD

s community leaders with MHAction, we come together to fight for housing justice because the economic security, shelter, and warmth that our homes and communities provide is being disrupted by greedy land speculators who are buying up our communities. The focus of this report is one of those speculators, Havenpark Capital, and their financial backers. The impact of the accelerated corporate buy-up of our communities is clear, especially on women and people of color. MHAction hears from residents daily about displacement due to rent and fee increases, health issues caused by community neglect, and stress-inducing harassment.

"Our stories are evidence of what's happening to our communities. Telling our stories ensures that people know us. We tell our stories, and along the way, our cities, counties, our hometown businesses, and churches become part of our fight. We use our stories to show how entities like Havenpark Capital, Enterprise Community Partners, and Fannie Mae have disrupted our lives for no other reason than to profit from us. We tell stories to create solutions to our shared struggles. We have to share our stories to keep the fight alive." — Candi Evans, Golfview Mobile Home Park, North Liberty, Iowa

This report will no doubt engender a response from these predatory actors and their backers that, somehow, MHAction has got it wrong. Their claims of benevolent action to preserve communities rely on dismissing residents' consistent and devastating accounts.

"I live in a community owned by Equity Lifestyle Properties. I think corporate owners forget about how our homes are our safe havens. They need to know that we are fighting to keep our homes and not sitting idly by while they try to make us homeless. We're uniting as one movement in this battle and pulling together women, people of color, seniors, and veterans. We know that more voices are better than one, and we hope this report moves you to join with us." — Beth Helmick, Buccaneer Estates, North Fort Myers, Florida

In Solidarity, MHAction National Core Leadership Team and Staff



"I've lived in my community for over forty years. This is a close-knit community with a lot of really nice people. Because we're close-knit, you see neighbors helping neighbors. When it snows, I see people go around and help others shovel snow. We help each other to cut grass in the summer; I have neighbors who will water my outdoor plants in the summer. Before my last cat passed, I had two neighbors that would take care of her when I was out of town. If I need help to carry something into my home from the car, I can ask neighbors who are home to bring it in for me."

- Terry Nelson, Rand Road Community, Des Plaines, Illinois

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Key Contributors: This report was written by MHAction staff in partnership with MHAction resident leaders, who have shared their deeply personal stories and who drive the strategy and action to address the injustices they face.

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Executive Summary

"I was so elated to have my own home. It was the first thing that I felt was 'mine' after a divorce. I wanted a stable place to take care of my daughter and my granddaughter who were living with me.... I lost so much due to Havenpark. I lost my home that was worth \$60,000, the money invested in lot rent, the shed, tools, all the things needed for maintaining a yard. I lost my entire settlement from my former employer. On top of that, I miss my lilacs, my roses, the feeling of having plenty of space. It's devastating to have your home ripped away from you."

- Linda Bates, former resident of Midwest Country Estates in Waukee, Iowa

cross the country, manufactured home communities provide millions of people, including low-income families, seniors on fixed income, immigrants, people with disabilities, and those displaced from high-cost cities, with affordable homes and diverse and caring neighborhoods. In these communities, residents own their homes but rent the land beneath their homes from a common community owner. This critical source of affordable housing in rural and exurban areas is under attack. Over the past two decades, financial firms and real estate companies have been buying manufactured home communities out from under the residents. Their goal is not to make homes and communities more stable, accessible, or affordable. Their goal is to extract easy profit from low-income residents.

While organizing their neighbors and fighting to save their communities from predatory investors, residents discovered that Enterprise Community Partners, a national affordable housing advocate, developer, and funder, is behind one of these investors. Enterprise's subsidiary, Bellwether Enterprise, is financing an entity called Havenpark Capital Partners, LLC ("Havenpark"). Havenpark is a private real estate investment firm that has bought up manufactured home communities, primarily in the Midwest and Mountain West. Rather than pursue well-established manufactured home community preservation strategies at scale, Enterprise Community Partners has chosen a manufactured home community investment strategy that is fueling displacement of residents, such as Linda.

Residents in Havenpark-owned communities report — drawing on examples from their own lives and their neighbors' — that Havenpark has dramatically increased lot rent (the rent residents pay for the land beneath their homes) and other fees, has invested minimally in community maintenance, and has adopted arbitrary and punitive rules. Residents report that Havenpark refuses to engage with them, and is pushing out residents during the pandemic.

Enterprise Community Partners has not taken adequate action to stop these abusive landlord practices. Instead, Enterprise has stood by their financing of Havenpark, from which they are profiting, while seniors and families struggle to afford rent, face harassment, or are pushed out altogether.

This report tells the stories of residents who have seen the affordability and livability of their communities destroyed by Havenpark. It calls out the actors who have caused that destruction — from Havenpark executives to Enterprise Community Partners and Fannie Mae.

Finally, it lays out a path forward with the demands of residents who are bravely organizing their neighbors and fighting to save their communities. Residents are calling on Havenpark, Enterprise Community Partners, state and federal elected officials, the Federal Housing Finance Agency, and Fannie Mae and Freddie Mac to all take action to:

- Keep our homes affordable with gradual, justified rent and fee increases and COVIDrelated rent relief
- Keep us in our homes with good cause eviction requirements and COVID eviction protections
- Make our communities safe and healthy with community maintenance
- · Treat residents decently and fairly
- Save our communities from predatory investors by supporting community ownership by residents, mission-driven nonprofits, and public entities

"Our community is banding together. We need to fight back before Havenpark evicts me and many of my neighbors. We're not going to sit around and simply let them kick us out of our community."

- Cindy Newman, resident in Great Falls, Montana

Resident of Montana

In this story and throughout this report, some residents of Havenpark Capital-owned communities have asked to remain anonymous out of fear of retaliation. These fears are especially pronounced for Black and Indigenous residents and residents of color, those who risk immigration consequences, those who live with the trauma of past displacement, and senior women living on fixed incomes.

I am a member of the Turtle Mountain Chippewa Tribe of North Dakota and am part French Canadian. I grew up in Chinook and Havre, Montana and attended school there. I initially worked jobs locally, and I also worked mining jobs in Anaconda and in North and South Dakota. I finally moved back to the Chinook area and was hired full-time with the railroad and worked the tracks for 30 years until I retired. I was proud to raise six children there. Now, I have one son who lives with me.

I moved to my community about 15 years ago. The rent for the land beneath my home was affordable at the time. I am 70 years old, and after hurting my back, I cannot work anymore. I live on a fixed income. About a year ago, Havenpark moved into the park and started charging us for everything. Now, I pay almost \$50 more in lot rent. Plus, they're raising other fees so much that I can hardly afford to live in my own home. Under the old management, we did have gradual increases, but nothing like this new owner. Now, fees are always going up, and it's pretty stressful.

They don't pay to improve anything in the park. Once, they laid a thin skin of new black pavement on the road, but that won't last. We have a lot of water running under this ground, like a river, so it will break up soon.

I own my own home and rent a little piece of land. I have about six feet of land on each side of my house. I try to keep it clean. I wanted to build a double deck, but I can't afford it anymore. I spend my time improving my home by planting flowers and watering the grass. But I can't water my yard anymore, since Havenpark put meters on. I now even pause and have to think about taking a shower because I'm so worried about whether I can afford the water bill.

Every time I turn around, they're raising more fees. This is all stressful because I live on a fixed income. I can't enjoy my retirement. As an Indian person, it feels like we're getting removed again.

Havenpark Capital Descends on Beloved Homes and Communities



"I'm 86 years old and I moved into my home at Midwest Country Estates 25 years ago. It was an excellent place to live then. Since Havenpark Capital bought our community about a year ago, it has been terrible."

— JoJo Bailey, resident of Midwest Country Estates, Waukee, Iowa

anufactured home communities provide affordable homes across the country. Almost three million households live in an estimated 45,000 to 50,000 communities.¹ In these communities, residents rent or own their homes and separately rent the land beneath their homes from a common community owner or landlord. Residents pay lot rent to the community owner for use of the land beneath their homes and for common infrastructure and services. ("Lot rent" is referred to as "rent" throughout this report). This shared ownership structure, often called a land-lease community, has long been a critical source of affordable housing in rural and exurban areas and small cities.² Manufactured homes cost half or less of a site-built house of comparable size.³ The lower costs have helped to provide affordable homes to low-income families, seniors, people with disabilities, immigrants, people displaced from higher-cost areas, and others in need of affordable housing options. The median household income of a family living in a manufactured home community is about \$35,688 annually.⁴

Manufactured home communities are not just affordable. They are diverse, walkable communities of tight-knit, caring neighbors. In these communities, residents meet for meals and bingo. People have laid down roots, envisioning a permanently affordable, peaceful place to retire or raise their families. Cindy Newman, a resident of Highwoods Mobile Home Park in Great Falls, Montana, explains, "This community has been my home for twenty years. I love my neighbors, and I love to tend to my garden. Nothing makes me happier than seeing my garden grow every spring."

But that sense of peace and comfort is under constant attack for many residents who live in communities bought by Havenpark Capital, a private real estate investment company that has purchased and operated manufactured home communities since 2016.⁵ (Havenpark Capital has since rebranded to Havenpark Communities.)⁶ According to resident reports, Havenpark is following the business model of real estate and private equity investors that have identified manufactured home communities as lucrative acquisitions from which to extract vast wealth at the expense of residents.⁷ The corporate buy-up of manufactured home communities is driving residents out of their homes and worsening residents' health and financial security.⁸ The impact is devastating, especially on women, people of color, and seniors.

Holly Hook, a resident of Swartz Creek Estates in Swartz Creek, Michigan, describes what happened when Havenpark bought her community in 2018: "No one knew that the ground under our feet was up for sale until a notice appeared on our doors notifying us that Havenpark, a company I'd never heard of, was the new owner. Also in the letter was a \$65 rent increase, due to start in 30 days, and a vague mention of 'improvements to the park.' This was in late July of 2018. That was a 22% rent increase. I needed answers as to why, so I researched Havenpark. I only found a website for investors with large text that talked about 'creating stable, long-term income.' Many of us owned our homes. It would cost thousands to move our houses. This left us trapped."

1. Havenpark is Making Manufactured Home Communities Unaffordable

Havenpark and Enterprise Community Partners have claimed that Havenpark's purchase of manufactured home communities is a strategy to preserve them as affordable housing. The residents of Havenpark-owned communities paint a different and dark picture. Residents in Iowa, Michigan, Montana, and North Dakota all reported — through individual interviews, an online survey, and social media posts — that, shortly after Havenpark bought their communities, their lot rent (the rent residents pay for the land beneath their homes) and other fees were dramatically increased. The increases in rent and fees that Havenpark has imposed have made it difficult for many residents to afford their homes and forced many out of the communities. These increases continued during the COVID-19 pandemic.

For residents in Holly's community in Swartz Creek, Michigan, monthly expenses have risen about 40%. Holly explained how increases grew after the initial 22% lot rent increase: "We got hit with a trash fee and a school tax. My total rent had now gone up by 30%. We all now had to cover our sewer charges when our rent covered it before. We also got hit with a monthly admin fee just to receive our bills. Two days after that, we got another letter. Another rent increase, this time \$25. In 13 months, our monthly payments rose \$124."

Similarly, Keith Hardy in Pine Ridge Mobile Homes in Linden, Michigan reports that Havenpark raised the rent from \$384 to \$420 when they bought his community in 2019, and that they added an \$18 trash fee, \$5 admin fee, \$3 school tax, and new water charges through separate meters that cost around \$40-\$50/month.

Initial increases were even higher in Iowa. Candi Evans in Golfview Mobile Home Park in North Liberty, Iowa reported on the 60% increase in her community: "Shortly after Havenpark bought our community, I opened my door to find a notice taped to it that informed me that the new owners would be increasing my rent from \$285 to \$475 beginning June 1, 2019. Because of our pushback, they reduced the initial increase to \$405. But even with those small retreats, we were to face an immediate 35% increase in our lot rent. Then they gave an additional \$35 increase in June 2020, in the middle of a global pandemic. We're just lucky that we have city water and garbage so they can't play with those services. So now, I'm paying \$440 just for the land beneath the home I own. Beginning April 1 of this year, my lot rent will be \$475. The full 60% within 24 months!"

JoJo Bailey, a resident in Midwest Country Estates in Waukee, Iowa, shared, "I was paying around \$300/month for my lot. Havenpark immediately tried to raise our rent \$200! We fought back and took our story to the Capitol and to reporters, and Havenpark backed down a little. But we are still hurting. The rent went up \$100 right away, plus new charges for sewer and garbage and new fees for little things — like to have my dog that doesn't even leave my property! Then they raised rent another \$50, plus new fees for my double-wide, so now I pay over \$500 per month, and they're planning another \$50 in rent increases this April."

Residents in Montana, whose communities were purchased more recently, reported initial increases of 15% to 30% for existing residents and above 50% for new residents. In Great Falls, Montana, Cindy explained, "Havenpark immediately raised our lot rent from \$283 to \$330, plus they added new fees for sewer, garbage, and storm water that were already covered in our lot rent. So really, they raised our lot rent to \$356. Then, they meter our water on top of that, which also used to be part of our lot rent. I'm frugal with water. In total, I'm paying \$363 now, up \$80 in one year. Our manager said soon we'll be at \$450, which is what they charge new residents."

Residents report that they feel trapped by these increases because they cannot move their homes. It costs \$5,000 to \$10,000 to move a mobile home. Even if residents could afford the moving costs, it is rare to find a new space to relocate a home, and the move could damage the structure. This leaves residents doing everything they can to pay the higher costs. JoJo explains, "I try to get by on my Social Security check and a part-time job at the grocery store. I'm still working at the store through this virus because I need that extra money to make ends meet. I'm hardly making it with \$600/month going to rent, fees, and utilities, plus my car payments, food, and an old hospital bill that I'm still paying off after I fell and broke my hip at my job at Walmart. It's rough."

Matt Chapman, JoJo's neighbor in Waukee, who is disabled and relies on disability assistance, was forced to pay nearly 75% of his income on housing costs with the increases that Havenpark imposed and had to rent a room in his home to a roommate to afford to stay. Seniors on Social Security similarly report spending the majority of their incomes on housing costs with the new fees imposed by Havenpark. Matt shared, "My buddy Tom is in his seventies and just lost his wife. When she passed, he lost her income as well. He spends over 60% of his income on housing, since he only gets \$1,000 after his Medicare premium is deducted. He has nothing left after he pays his monthly bills."



These increases have continued throughout the COVID-19 pandemic, forcing some residents, like JoJo, to work risky service jobs to pay the rent. Worsening residents' hardship in the middle of the pandemic, Havenpark has refused to take partial rent payments, even though the Centers for Disease Control and Prevention's eviction moratorium specifically provides protection for residents who make partial payments on their rent during the pandemic.¹⁰

JoJo summarized the impact of the rent and fee hikes and her limited options: "I don't want to move, and I don't want to lose my neighbors. But if I can't afford to be here, I'll have to find something. Maybe I'll find a roommate. Or pitch a tent."



Barb Gaught

Former resident of Cherry Creek Mobile Home Park, Billings, Montana

My name is Barb Gaught, and I moved into Cherry Creek 15 years ago with my husband and three children. Our home had been my parents' home, and we could afford the lot rent. It was a good place for a young family.

When Havenpark took over the court in the spring of 2020, everything started changing. They changed how the water was billed. They put water meters on the trailers; where under the old owner, I paid \$35/month for water, under Havenpark, I had to pay almost \$150 in water each month. They started charging for garbage. They changed rules about how everyone's yard looked. If you had a fence, it had to come down. They made rules about gardens. They said no trampolines. You couldn't have toys out in the yard — said "it looked like trash." People started objecting to the rules. We wanted to have basketball hoops for our kids, to keep our fences and sheds where they were. Havenpark didn't like our pushback against these arbitrary rules.

The previous owner was good at working with us and accepting partial payments. Havenpark has refused partial payments. In October, I was behind on my lot rent. It was my understanding that we had until the end of the year to pay because of the CDC eviction moratorium. But suddenly, I was given an eviction notice. In addition to paying the rent I owed, they said I had to pay for their attorney fees. It would have been thousands of dollars, which I didn't have. I didn't fight the eviction notices; I thought I was going to be okay if I paid before the end of the year.

The Friday before Christmas, a sheriff showed up and taped a notice of seizure on my door. Havenpark gave me until the following Monday to leave. They took my home, the home my parents purchased with their savings. I was afraid. I didn't understand what was happening or how we could stay, so we packed up and left. A few days after I left, they changed the deadbolt on the door, and I couldn't return.

I've been in a Super 8 with my family since then. It costs \$500 a week. Soon, we will all be homeless. We've looked at apartments, but my credit isn't good enough. They want \$40 for an application fee for each adult. That's hundreds of dollars in fees. I don't have that.

I want the laws to change. Havenpark threw my family out right before Christmas. They swept our whole world out from under us. I don't want that to happen to anyone else.

2. Havenpark is Ruining, Not Investing In, Communities

Havenpark claims that the large rent and fee increases are justified by significant investments in community improvements. ¹¹ Residents have not seen these improvements. Cindy from Great Falls, Montana explained, "Havenpark has done nothing but regular annual maintenance, nothing to justify the increases. I chose to move to The Highwoods because this park was beautiful and well–maintained 20 years ago, and it has been kept that way *without these big increases*. The prior owners only raised our rent an average of 2.9% each year."

Residents report that, despite promises of big improvements, they have only seen regular maintenance or surface changes by Havenpark, such as repaved roads, landscaping, emergency repairs, and swingsets. Matt in Waukee, Iowa explained, "When Havenpark took over, we were promised a community center with locked mailboxes that has never been mentioned again. We were told at a meeting at the West Des Moines Sheridan that they were going to have a scholarship fund and a dog park. All they have done is blacktop some streets, cut down a few trees, build a playground, and make small emergency fixes on the water lines. We have seen no signs that Havenpark is investing the large increases back into our community."

Residents report concerns that community maintenance and amenities have diminished since Havenpark took over. Carla Hill in Billings, Montana reports, "The basketball court and tennis court were taken out six months ago. The chain link fence has wires sticking out. There's a rusty merry-go-round. There's an activity clubhouse, but they charge us \$300 to use it. Why would we pay so much to use an empty room?"

Furthermore, some of Havenpark's changes are increasing costs and worsening life for residents. Matt Chapman in Iowa explains, "On top of the giant rent and fee increases, they want to pass other costs onto us too. They replaced the effective brass water meters we had



for years with cheap plastic water meters, so they can read them from the office without walking around. They're telling us, if their cheap meters break from our pipes freezing, they'll charge us \$275 and take us to court to collect those fees." Residents in North Dakota and Montana similarly report that Havenpark is putting in plastic water meters and, in some cases, disrupting heat tape on their pipes, increasing the likelihood that pipes and meters will freeze and break in cold weather and that residents will have to foot the bill.

In Meadowlark Community in Billings, Montana, residents have voiced frustration that, while their water charges went up with the new meters, they have dealt with water shutoffs and unhealthy water that they do not drink. A resident shared, "The water is black. There should never be a time that I turn on my shower and the water smells like it has more chlorine than a swimming pool. Why are they charging us? It's horrible." She further reported long periods without water: "The shortest was 10 hours and the longest was 3.5 days. The other three times were over 24 hours. I understand things break. However, not one single time has the maintenance staff or management communicated anything to us."

A resident at Sunrise Village in Iowa City, Iowa, also shared problems with their water: "Then they started charging for water, \$13.80. The water, which is from the well, is not clean. We're buying water for cooking and for drinking. I don't know why they're charging us. The previous owner had promised to improve our water system, but he wasn't able to do it before the new owner [Havenpark] bought the park. We've never spoken to the new company. My wife asked for the phone number for the woman in the office — we call, but nobody ever answers."



Candi Evans, North Liberty, Iowa (photo credit Adriana DeRosa)

Residents reported that, rather than investing in community infrastructure, Havenpark has focused on bringing in new homes that they can sell or rent at a higher price. Holly in Swartz Creek, Michigan shared, "It seems like they are pushing out older residents in older homes to make room for these newer homes that they can make more money off of. Elderly residents are facing harassment. A number of elderly and disabled residents were falsely accused of being late on rent and charged late fees, over and over again. This had never happened before." Residents in Montana also reported a similar pattern of Havenpark targeting residents in single-wide homes with violations and evictions, and replacing their homes with new double-wide homes

3. Residents Are Living in Fear of Harassment, Retaliation, and Eviction

Havenpark has implemented new rules that residents contend are unreasonable and harassing. Violations of these rules are used by Havenpark to threaten eviction.¹²

In October 2020, Havenpark delivered notices threatening eviction to numerous families in North Liberty, Iowa over rule violations.¹³ These families were struggling to recover from the August derecho storm as well as the COVID-19 pandemic.

The Iowa City Press-Citizen reported, "On Oct. 8, [Megan] Morgan received a notice of violation telling her to remove her daughter's six-foot-tall swing set. The notice threatened her with a \$50 fine and added, 'Failure to remedy the infraction(s) by the due date could lead to eviction.' 'Over a swing set?' Morgan told the Press-Citizen. 'Because of the pandemic, she was going crazy from being cooped up inside. I don't see what the problem is. It is a really small swing set."¹⁴

The Iowa City Press-Citizen reported that Morgan's neighbor, Scott Burgess, received a similar threat of fines and eviction for a hole in his roof that the August derecho storm had left: "On Aug. 17 — a week after the storm tore across central and eastern Iowa — he had a cancerous tumor removed from his kidney. And after a month of recovery, he had to go under the knife a second time, on Oct. 1, to remove an obstruction from his esophagus. Like Morgan, on Oct. 8, he got a notice from management telling him his damaged roof and [siding] need to be fixed by Thursday, Oct. 15, or fines would be levied and eviction proceedings would commence. 'You know, I'm on disability. I need more time,' Burgess told the Press-Citizen." 15

"Some people were given 5 days to fix their roof or remove the swingsets; others were given two weeks," Candi, a resident in North Liberty, Iowa, said. "I understand Havenpark sent out over 100 notices saying, if the construction wasn't completed in time, we'd be evicted. One of the residents stopped the manager and said, 'We can't get contractors here for months — they're all booked up."

Ultimately, the homeowners association in North Liberty, which had first united to fight back against Havenpark's large rent increases, stood up for the neighbors who were being threatened with eviction. In response, Havenpark provided residents with minor assistance and another month to fix the violations. ¹⁶ Candi explained, "It wasn't until we drafted a letter to Havenpark's attorney that they replied, we're just giving a gentle reminder. People are on disability; they need more time. Even though no one was evicted, it created a sense of anxiety and instability for all of us."

In Montana, Havenpark has not provided residents with new leases. Instead, they are providing notices about the rules piecemeal. Residents report that, within days of notifying residents of the rules, Havenpark is issuing eviction notices over violations. A resident recounted, "One of my neighbors was threatened with eviction because they had a blanket in their window — they had a kid; it was their kid's bedroom. They have threatened people over broken blinds, basketball hoops, and toys in the yard. These are things that are inside their homes or yards. Havenpark shouldn't be able to have a say over that."

Residents report that these threats create fear and significant stress among residents. Marilyn Langley, a resident of Pine Ridge Mobile Home Park in Argentine, Michigan, said, "My neighbors and I are on our last leg. We're seniors on fixed income — we should be traveling and enjoying our retirement, not wondering if we can afford food, medication, fuel, utilities, and unpredictable fees from a corporate owner. Havenpark will do anything to make a profit off of us. I believe people are scared to stand up because they're scared to get pushed out of their homes."

In Iowa, Candi reports a similar sentiment of fear: "People are intimidated. A lot of people just won't come forward. People like my neighbor Scott don't have anywhere else to go — they can't afford to go anywhere else. When I go to the newspaper, Scott will say: are they going to evict me? And I'll say, if we don't speak up, they'll evict us all."

Immigrant families face additional barriers and risks when speaking up. Mayra Hernandez Garcia, Community Organizer at the Center for Worker Justice of Eastern Iowa, reports, "I have listened to many people who live in mobile home communities — that have been bought by out-of-state companies — talk about the sudden rent increases, additional fees, and very low water quality and how all of this has drastically impacted their lives. Many residents from mobile homes communities, like Sunrise Village, have spoken to me about their deep concerns for how they will continue to afford the increases in prices just to be able to stay in their homes, where they have lived for years and invested so much. Residents from all backgrounds are hurting by the lack of protections for mobile home park tenants. Some residents are afraid to speak up because they are afraid of retaliation, and many face a daunting language barrier. But it is also important to note that these residents are resilient, no matter their background. It is incredible, the amount of work mobile home residents have put into fighting for protections and rights for all tenants, across race and economic and immigration status, and they are determined to reach these goals."

Resident of Sunrise Village, Iowa City, Iowa

I live in Sunrise Village in Iowa City. I've lived here with my family for six years, renting both the home and the lot. There are five of us living together. We'd been in another trailer community nearby before moving here. The previous owner was so kind. Every week, we'd see him. He'd come around to say hello and see if we needed anything.

About five months ago, we got a letter saying that another company bought the park, and that there would be new rules. They gave us a 30-day notice announcing that there would be a hike in the rent. Before, lot rent was very affordable: we paid \$295 each month until the owner fixed the road about four years ago, when he increased our rent to \$325. But when the new company [Havenpark] moved in, our rent increased to \$467. They continue to raise the rent and add fees without any explanation. Just this month, our rent increased again to \$499. I'm also charged \$15 for my dog. The previous company didn't charge us for owning pets.

Four months after buying the park, they told us they'd take away the trash containers and give us new ones. They charge almost \$18 monthly for garbage. Then they started charging for water, \$13.80. The water, which is from the well, is not clean. We're buying water for cooking and for drinking. I don't know why they're charging us. The previous owner had promised to improve our water system, but he wasn't able to do it before the new owner [Havenpark] bought the park.

We've never spoken to the new company. My wife asked for the phone number for the woman in the office — we call, but nobody ever answers.

There are many families who are unhappy, and many have decided to leave. I don't know where people go when they leave the park. We don't know what our plans are. I don't want to leave my home behind, but maybe we should. We're renting because we can't afford to buy our home now. I want to be able to stay with my family here — it used to be peaceful and quiet. Havenpark's treatment and rent increases are pushing out Mexican American families like mine. We're working families, but when people don't have papers, they struggle to find work. We need to have stable places to live for our families.



 $Iowa\ residents\ call\ on\ elected\ officials\ to\ increase\ protections\ against\ predatory\ community\ owners, like\ Havenpark,\ December\ 2019$

4. Havenpark is Displacing Seniors and Families

The ultimate result of Havenpark's rent and fee increases, harassment over rules, and eviction threats is displacement of seniors and families.

A lucky few have found a new community for their mobile homes. For example, Benjamin Gedney from Golfview Mobile Home Park in Iowa was able to move his home across the street, where a family-owned park agreed to pay the majority of the expensive moving costs. "This is an example of how [my new park owners] care more about the community. It cost about \$5,000 to move a home, and they paid for \$4,000 of it. We only had to come up with \$900." Benjamin shared that 15 other families took advantage of the offer to move to the community across the street when Havenpark bought their community.

But residents made clear that Benjamin's situation is an extremely rare opportunity. Most people who cannot afford the rent increases, fight the eviction threats, or take the stress are much worse off. Candi shared, "Since Havenpark Capital purchased our park, we have lost nearly 40 families. Some moved in with relatives. I'm not sure where others went. Some of these people sold their home for a loss — one for just \$500 — because they could not afford the rent increase, and no one was interested in having Havenpark as their landlord. We also know several families who left here went to Western Hills Park and then were shocked to find out that Havenpark bought that too."

Holly in Swartz Creek, Michigan shared, "A neighbor, who is 80 years old, had to move out due to stress and increases, and wound up in a senior's apartment with so many rules that she's not happy there. Another friend of mine in a different Havenpark-owned community almost lost her home because of the increases and had to make a GoFundMe to keep her home. She's lived in her house, which she owns, since 1991, and now she's scared of being priced out."

Residents report that, even when they are on top of the rent, Havenpark is taking advantage of limited or no state-level eviction protections. MHAction has found that, while very few cases go to court because residents are scared to fight the evictions, many result in displacement, like in Linda's case.

Linda BatesResident of Midwestern Country Estates, Waukee, Iowa



My name is Linda Bates, and I moved into Midwestern Country Estates in Waukee, Iowa in November of 2016. I could afford a home there after receiving a settlement from UPS due to chronic injuries I suffered from over 15 years working there — now, I have to use a cane when I walk.

Before then, I had been moving from apartment to apartment. I was so elated to have my own home. It was the first thing that I felt was "mine" after a divorce. I wanted a stable place to take care of my

daughter and my granddaughter who were living with me. I paid for my home in cash with my settlement money. I only had to pay lot rent, which was reasonable — \$300 a month. Over those 4 years, lot rent only increased twice up to \$320/month. I could afford it on my pension. I planted beautiful bushes in my yard, and flowers that made me feel at peace. I could sit on my swing and look at them from my porch. Since my back is bad, I loved being able to walk to get everything I needed: the doctor, the mail. I had a place to call home and a small yard for the first time in years.

When I got the word that Havenpark was moving in, I immediately began preparing to put up my house for sale. I had heard awful things about Havenpark. Everybody was scared. Havenpark announced they'd increase rent to \$500 a month. The first people to go were the people who'd been living there for 40 years — the increase was too large for fixed-income folks. Havenpark said they had the right to raise the rent because it was an up-and-coming community. People in the park organized meetings with local legal aid. Because of our organizing, the corporate owners agreed to go up to \$400 at first, and then up to \$500 the next year.

I believe Havenpark tried to evict me so they could take my brand-new home. Last year, I was sent a notice that they weren't going to renew my lease. I kept getting notes posted to my door: I couldn't have a small pool in my yard for my grandkids, I didn't mow well enough for them, I got complaints about my driving. I asked them why I was being evicted — they responded, "Why don't you figure that out?" They told me it was legal not to have a reason to evict me. There was a lot of harassment going on. They accused me of failing to pay rent three different times. Each time, I went in with proof that I'd paid. I put my name on the envelope. I tried to stay as long as possible, but on March 15, 2020, we had to be out.

When I tried selling my home, I couldn't lie to people about what it was like to live in a Havenpark community. No one wanted to live there. If you're evicted like that, either you come up with the



money to move your home, or Havenpark takes it. I was getting desperate. At the last minute, a guy called about buying the house, but would only pay \$22,500 for it. I had paid \$61,000 in 2016, so I took an immense loss. My family said, better to leave with something rather than nothing.

I tried to find an apartment for my family, but the application fees added up. The man who bought our home said he owns a park, and we could use \$2,500 of the money he gave us to pay for rent (\$700) in a home in his park, so we would be paid up until July. When we moved into the trailer, I spent a day cleaning the place; it was a mess. I found out I ended up in the hands of a slumlord — he didn't want to fix anything. It was a battle on the phone every time we needed something fixed. We lived there for about six months. The week before we moved out, he shut off the water. We couldn't flush the toilet. It was miserable.

After that, I found a small 2-bedroom apartment in De Soto, half the size of my previous home. I pay \$550 a month, which I can't really afford. We have no yard, no flowers. I have to climb 13 steps with my cane to get to the laundry. I have a mini stove that burns everything. We had to beg the landlord to put in air conditioners. But everything works, so it's a bit better than our last place.

I lost so much due to Havenpark. I lost my home that was worth \$60,000, the money invested in lot rent, the shed, tools, all the things needed for maintaining a yard. I lost my entire settlement from my former employer. On top of that, I miss my lilacs, my roses, the feeling of having plenty of space. It's devastating to have your home ripped away from you.

I hope that the people who managed to get out can find a place better than me. I expected to be in that home until I died. Now, I just have to do whatever I can to keep a roof over my granddaughter and daughter's head.

How Havenpark, Enterprise Community Partners, and Fannie Mae Are Profiting Off of Displacement

1. Havenpark Capital Executives & A History of Immoral Business Practices

Havenpark Capital Partners, LLC is an Orem, Utah-based private real estate investment company. It was founded with the merger of Worldwide Solutions, an investment firm headed by J. Anthony Antonelli, and Hacienda Capital Partners, which was headed by Lisa and Robinson Pratt, Antonelli's daughter and son-in-law. Havenpark exclusively purchases and operates manufactured home communities. Havenpark no longer publicly releases the location of its acquisitions, but residents, local officials, and no longer publicly-available internet sources report that Havenpark has purchased communities in Iowa, Illinois, Michigan, North Dakota, Montana, Ohio, Missouri, Nevada, Oklahoma, Kentucky, Texas, and Indiana.

Havenpark's business model promises high-yield returns to investors. Online promotional materials (which are no longer publicly available but can be accessed through web archives) told investors, "We create value through aggressive optimization programs and lean property management systems rather than trying to time the market. We only acquire properties that generate a significant target cashflow from day one AND have ample upside opportunities that will allow us to significantly raise the value and cashflow of the property in ANY market — good or bad."²⁰ Other investor materials stated, "The firm buys communities with significant upside potential in strong metropolitan areas and works aggressively to drive additional value through various operational methods."²¹

"Tenant turnover is also minimal since it is difficult and very expensive (\$6,000-8,000+) for tenants to move their homes. As a result, operating cashflow is among the highest of any real estate class." Senator Elizabeth Warren called out Havenpark in an Iowa City Press-Citizen op-ed, stating, "Private equity firms like Havenpark don't see these properties as real land that real Iowans live on. They see them as assets to be squeezed and flipped for maximum profit."

From the perspective of residents, those "operational methods" that "drive additional value" — for example, large lot rent and fee increases, limited improvements, and threats of eviction — are to the great detriment of residents. Indeed, Havenpark's promotional materials point out the tenant hardships that make Havenpark's returns possible, boasting, "Tenant turnover is also minimal since it is difficult and very expensive (\$6,000–8,000+) for tenants to move their homes. As a result, operating cashflow is among the highest of any real estate class."

Havenpark's abusive landlord practices have garnered the attention of government officials. Attorneys General in Michigan, Indiana, Ohio, and Iowa have all received complaints from residents of Havenpark properties. Senator Elizabeth Warren and U.S. Representatives Dave Loebsack and Cindy Axne sent letters to Havenpark, demanding answers about the exploitation residents have reported. Havenpark's treatment of residents has been highlighted in congressional hearings, been explored by presidential candidates, and sparked state and federal bills aimed at preserving mobile home communities. Senator Elizabeth Warren called out Havenpark in an Iowa City Press-Citizen op-ed, stating, Private equity firms like Havenpark don't see these properties as real land that real Iowans live on. They see them as assets to be squeezed and flipped for maximum profit.

Bad publicity and government investigations into allegations of illegal business practices may be familiar to Havenpark executives. J. Anthony Antonelli and another senior Havenpark employee were high-ranking distributors at Nu Skin Enterprises, a multilevel marketing company that sells skin products and dietary supplements. In the early 1990s, Nu Skin was investigated by numerous State Attorneys General and the Federal Trade Commission (FTC) and was the subject of negative reports by Nightline, USA Today, and Newsweek. The Attorney General of Michigan, demanding reforms by Nu Skin, said, The Nu Skin operation in the state of Michigan is an illegal pyramid franchise. The FTC's investigation into complaints of deceptive advertising and misrepresenting income earned by distributors led to Nu Skin signing a 1994 consent decree and paying a \$1 million fine. Then, in 1997, the FTC found Nu Skin in violation of the 1994 agreement, and Nu Skin agreed to pay an additional \$1.5 million penalty. Nu Skin's troubles continued with investigations by the Chinese government and the U.S. Securities and Exchange Commission as recently as 2016.

2. Enterprise Community Partners Fueling Exploitation of Low-Income Residents

Residents of Havenpark-owned communities were astonished to learn that Havenpark's buy-ups are financed through a subsidiary of Enterprise Community Partners. Enterprise is a national affordable housing nonprofit that provides technical assistance to local governments, advocates for affordable housing policies, and finances and develops affordable housing.³³ Today a behemoth in the affordable housing world with thousands of local partners and over 1,100 employees nationwide,³⁴ Enterprise was founded in 1982 by James and Patty Rouse. James was inspired to partner on affordable housing projects with women in the Adams Morgan neighborhood of D.C. who brought a "fierce dedication to their own neighborhood and a real understanding of its needs."³⁵ Their goal was to "continue working until everyone in our country had a safe, healthy and affordable place to call home."³⁶ Enterprise celebrates those roots and states that its current priorities are to increase housing supply, advance racial equity, and build resilience and upward mobility for residents.³⁷

At odds with this mission, Enterprise is fueling Havenpark and its displacement of families and seniors in manufactured home communities. Havenpark's manufactured home community purchases are financed through Bellwether Enterprise, a commercial and multifamily mortgage bank that is owned and controlled by a partnership between Enterprise Community Partners, an ownership group of Bellwether employees, and Fifth Third Bank.³⁸ Bellwether Enterprise's website explains, "A large portion of our revenue supports our nonprofit parent company, Enterprise Community Partners, Inc." Priscilla Almodovar, Enterprise Community Partners President and CEO, and Charles Werhane, Enterprise Community Investment, Inc. President and CEO, sit on the Board of Directors of Bellwether.

Enterprise executives have repeated Havenpark's claim that its purchase of manufactured home communities is an affordable housing preservation strategy, saving these communities from being closed and redeveloped. A Residents from struggling areas like Great Falls, Montana, Swartz Creek, Michigan, and West Fargo, North Dakota have suggested it is absurd to say that their communities were at risk of being redeveloped into high-end residential or commercial use. "This is a dying town," said Cindy from Great Falls, MT. And residents in North Liberty, Iowa received assurances from their local officials that they would not have allowed manufactured home communities to be redeveloped.

Moreover, if these communities were at risk of redevelopment, there are established strategies for preserving manufactured home communities as affordable housing. These include eviction and tenant protections, zoning that protects manufactured home communities, and alternative community ownership by resident-owned cooperatives, nonprofits, land trusts, and public housing authorities. Across these strategies, [e]stablishing mechanisms for permanent affordability is necessary.

"It is outrageous that Havenpark's financing to buy my community was through Enterprise Community Partners's subsidiary. How could Enterprise, Bellwether, and Fannie Mae claim this financing is preserving affordable housing? How could they let these loans be captured by private equity groups to raise rents, receive big payouts, and push out the most vulnerable tenants? How are they taking Anthony Antonelli's word over ours?" questioned Matt from Waukee, Iowa.

Instead of following such sensible preservation strategies, Enterprise has fueled Havenpark's purchase of manufactured home communities with no protections against rent gouging or unjust evictions, no advocacy for protective zoning, and no plan for establishing permanent affordability. Worse, when MHAction leaders brought their stories to Enterprise, explaining the hardship families and seniors are facing at the hands of Havenpark and the threats to their communities, Enterprise ignored them for eight months. Then, in the spring of 2020, as Havenpark was increasing rents and fees during the COVID-19 pandemic, residents made their demands public and launched a petition calling on Ed Norton, the actor and grandson of James and Patty Rouse, to take action. When MHAction leaders finally met with Enterprise's President and CEO in August 2020 and asked Enterprise to stop Havenpark's exploitative practices, Enterprise said they could explore state policy advocacy in this area, but they have no control over rents or landlord practices.

"It is outrageous that Havenpark's financing to buy my community was through Enterprise Community Partners's subsidiary. How could Enterprise, Bellwether, and Fannie Mae claim this financing is preserving affordable housing? How could they let these loans be captured by private equity groups to raise rents, receive big payouts, and push out the most vulnerable tenants? How are they taking Anthony Antonelli's word over ours?" questioned Matt from Waukee, Iowa. In direct opposition to its priorities, Enterprise's subsidiary's financing of Havenpark's manufactured home community purchases is decreasing affordable housing supply, hurting low-income residents and residents of color, displacing families, and destabilizing communities.

3. Fannie Mae Running Afoul of Its Affordable Housing Mission

Havenpark's community acquisitions, financed through Enterprise Community Partners's subsidiary, were made possible by the government-sponsored enterprise Fannie Mae. Havenpark utilized a Fannie Mae credit facility, facilitated by Bellwether Enterprise, to fund \$100 million in manufactured home community acquisitions.⁴⁴ Bellwether has Delegated

Underwriting and Servicing (DUS) status at Fannie Mae, through which Bellwether can provide direct, non-recourse loans, reducing the costs and risks of the loan to the borrower. Havenpark Managing Partner Robbie Pratt stated that Fannie Mae gave Havenpark "the agility we need to execute on our acquisition strategy while providing long-term stability as well as strategic flexibility as we operate our properties over the long haul. Whether it is unlocking trapped value, asset disposition, property replacement, or new acquisitions, the Fannie Mae credit facility product does it all. It is truly a remarkable product backed by a fantastic team that has supercharged our asset acquisitions and portfolio optimization."

Fannie Mae – the Federal National Mortgage Association – was created by the federal government during the Great Depression to expand access to affordable homeownership by providing "liquidity, stability, and affordability in the mortgage market." In 1968, Fannie Mae became "a private share-holder-owned corporation chartered by Congress" or a government-sponsored enterprise (GSE), no longer funded through the federal budget. In 2008, Fannie Mae, along with the Federal Home Loan Mortgage Corporation (Freddie Mac), lost billions of dollars on investment portfolios and their mortgage-backed securities guarantees. As a result, the federal government put Fannie Mae and Freddie Mac under conservatorship by the Federal Housing Finance Agency (FHFA).

Today, Fannie Mae aims to "provide a stable source of liquidity for mortgage lending, supporting greater access to affordable homes and rental housing finance in all markets, at all times." ⁵⁰ Further, Fannie and Freddie have particular obligations to serve underserved markets, including manufactured housing. ⁵¹



Despite their affordable housing mission and the particular "duty to serve" manufactured housing, Fannie Mae and Freddie Mac have made only small promises, and even smaller progress, toward supporting resident-owned cooperatives and nonprofit-owned manufactured home communities. 52 Worse, they have provided billions of dollars in GSE-backed multifamily loans for manufactured home community portfolio acquisitions, like the Havenpark purchases financed through Bellwether Enterprise, which have made manufactured home communities unaffordable for long-time residents. 53

Under the FHFA's direction, Fannie and Freddie provide incentive pricing for borrowers who implement a set of "Tenant Site Lease Protections." These include a one-year renewable term for the site lease and other rights related to manufactured homeowners' ability to sell their homes and to be notified of rent increases and evictions. ⁵⁴ However, the Tenant Site Lease Protections do not provide incentives or set requirements that protect against no-cause eviction, rent and fee gouging, or arbitrary rules, or that otherwise ensure the affordability of manufactured home communities.

In response to the rent and fee gouging imposed by Havenpark, MHAction leaders have demanded that the GSEs include affordability and good cause eviction protection requirements in multifamily loans and shift loans toward resident-owned cooperatives and nonprofits, away from exploitative investors. Resident organizing and advocacy has led to Members of Congress joining the fight. For example, Senator Sherrod Brown sent a letter to the FHFA and the GSEs, demanding answers about the manufactured home community financing to private equity groups. Demands from residents, advocates, and practitioners resulted in a step forward. In November 2020, the FHFA announced new requirements on Fannie Mae and Freddie Mac's manufactured home community lending, requiring that half of GSE-backed multifamily loans go to affordable housing and that, to be considered affordable, manufactured home communities must be resident-owned cooperatives, be nonprofit-owned, or commit to the FHFA's Tenant site Lease Protections.

Due to the weaknesses in the FHFA Tenant Site Lease Protections, residents say more steps are needed to address the dire circumstances of residents in communities owned by Havenpark and other predatory investors. "We called on FHFA and Fannie and Freddie to protect residents and the affordability of our communities. We need them to do more to stop abuses by manufactured home community owners," said Holly from Swartz Creek, Michigan. To meaningfully protect residents and maintain affordability, the FHFA, Fannie, and Freddie must take steps to restrict rent gouging, imposition of unreasonable fees, no-cause evictions, harassment, neglect, and other unfair or deceptive practices by making these stronger protections a condition of financing for manufactured home park purchases.

MH ACTION

The Pathway Forward: Residents Map Out Solutions

esidents of Havenpark-owned communities are bravely sharing their stories, organizing their neighbors, and engaging Havenpark, Enterprise Community Partners, Fannie Mae, and officials at all levels of government. They are calling on decision-makers to stand up to predatory investors and help protect families and seniors who are being pushed out of their homes and communities. They are demanding:

I. Keep Our Homes Affordable

"If I can't afford to be here, I'll have to find something. Maybe I'll find a roommate. Or pitch a tent."

- JoJo, Waukee, Iowa

- Enterprise Community Partners and Havenpark must reduce excessive rent increases and those imposed during the COVID-19 pandemic and commit to gradual, justified future rent and fee increases in Havenpark-owned communities, and must advocate for rent justification policies.
- **State policymakers** must protect residents from rent gouging by adopting rent justification policies that only allow gradual, justified rent and fee increases.
- Federal policymakers, the FHFA, and the GSEs must ensure that the GSEs are
 advancing, not undermining, affordable housing with manufactured home community
 financing by placing conditions on all multifamily loans to protect tenants from rent
 gouging.

II. Keep Us In Our Homes

"Havenpark threw my family out right before Christmas. They swept our whole world out from under us. I don't want that to happen to anyone else."

- Barb, Billings, Montana

- Enterprise Community Partners and Havenpark must commit to good cause eviction policies and halt evictions during the COVID-19 pandemic in Havenpark-owned communities, and must advocate for policies that provide good cause eviction protections and long-term protection against displacement and debt due to COVID-19.
- State policymakers must protect residents with good cause eviction protections and COVID-19 eviction moratoriums, rent relief, and long-term protection against displacement and debt due to COVID-19.
- Federal policymakers, the FHFA, and the GSEs must ensure that the GSEs place
 conditions on multifamily loans to prohibit no-cause, harassing, and retaliatory
 evictions by borrowers.

III. Make Our Communities Safe and Healthy

"The water, which is from the well, is not clean. We're buying water for cooking and for drinking. I don't know why they're charging us."

— Resident, Iowa City, Iowa

- Enterprise Community Partners and Havenpark must provide preventive maintenance and competent management to keep communities safe and healthy in Havenpark-owned communities.
- State policymakers must adopt policies that require safe and healthy maintenance of manufactured home communities.
- Federal policymakers, the FHFA, and the GSEs must ensure that the GSEs place
 conditions on multifamily loans to ensure safe and healthy maintenance of
 manufactured home communities.

IV. Treat Residents Decently and Fairly

"They have threatened people over broken blinds, basketball hoops, and toys in the yard. These are things that are inside their homes or yards. Havenpark shouldn't be able to have a say over that."

- Carla, Billings, Montana

- Enterprise Community Partners and Havenpark must engage community members in development of rules that are fair and reasonable, must stop retaliation and harassment, and must follow fair housing and language justice practices in Havenpark-owned communities.
- **State policymakers** must ensure community engagement and prohibit community owners from retaliation, harassment, and discrimination.
- **Federal policymakers, FHFA, and the GSEs** must ensure that the GSEs adopt requirements and monitor treatment of residents by multifamily borrowers.

V. Save Our Communities From Predatory Investors

"We tried to purchase our park from our private equity landlord, Sunrise Capital Investors, that was rent gouging us, but they wouldn't negotiate in good faith. If we had the opportunity to purchase law here, today we would be living in a co-op or land trust. Instead, the park was sold to a new investment firm, and once again, we have no control over our destiny."

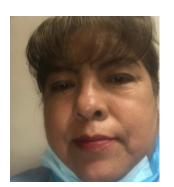
 Gail Travers, resident of Akron Mobile Home Park, owned by Cook Properties, Akron, New York

- Enterprise Community Partners and Havenpark must advocate for opportunity to purchase laws and acquisition funds to give residents, nonprofits, and public entities a meaningful chance to compete with predatory investors and stop their takeover.
- State policymakers must adopt opportunity to purchase laws and acquisition funds.
- Federal policymakers, the FHFA, and the GSEs must ensure that Fannie Mae and Freddie Mac increase financing for community purchases by nonprofits, public entities, and resident-owned cooperatives at a significantly larger scale than the current commitments under the Duty to Serve Plans.

If Havenpark, Enterprise Community Partners, and Fannie Mae cannot right their wrongs by meeting these demands, they are perpetuating an immoral and unjust housing system, and they must end their involvement in the manufactured home community sector: Havenpark must sell the communities it owns to residents or qualified housing organizations that will commit to affordability and anti-displacement practices, and Enterprise Community Partners and Fannie Mae must end their manufactured home community financing.

MHAction leaders will continue engaging their neighbors and partnering with tenants and allies to build a housing system that serves people's health and security, not the profits of wealthy investors. They will not rest until predatory investors stop destroying manufactured home communities and everyone has an affordable home in a healthy community. They call on residents to share their stories and join the movement.





"The people here are very motivated to change. I'm here because I'm against the property owners who raise our rent and the managers who don't treat renters of manufactured homes well. It's unjust that elderly people in some parks might face rent increase every four months, and they aren't able to pay rent. This is why we have to fight against the injustices that

we see, for the people who are afraid to speak up. We must come together to fight and say that we aren't going to put up with these practices."

 Pastora Martinez, resident of Country Club Mobile Home Park, owned by Kingsley Management, Santa Ana, California

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