

The following is Stephen Johnson, Colony Cove, Inc, and Sequiota Investments, Inc. answer to PSC complaint MC-2025-0108:

Champion Homes delivered to Evergreen mobile home park a home on 11/15/22. This home was rented and has been occupied continuously since 2/1/23. Champion homes delivered a home to Colony Cove MHP a home to lot 30 on 2/21/23. This home was lived in for one full year from 3/1/23 until 3/1/24 and has been vacant since and is red tagged by the PSC. The home on lots 26 and 46 at Colony Cove were delivered on or about 4/26/23 and have been rented and lived in continuously since 12/15/23. The home on lot 29 was delivered on 5/15/24 and has been vacant since and is red tagged by the PSC.

On or about February 2023 a female representative from the manufactured home program of the PSC called and spoke to Stephen Johnson about their requirements. In the conversation when it was established that the new manufactured homes would only be rented and not sold, Stephen Jonson was personally told that it was not necessary to become a dealer and register with the PSC.

It is the respondent's position that all but one of these single wide mobile homes should at this point be considered used mobile homes since the sales tax has been paid and they have been lived in from 10 to 20 months. These mobile homes are set up and tied down exactly like all the other mobile homes in this 150 unit park. There has not been a single safety concern issue with these five mobile homes.

To do an enforcement inspection some 18 months after the first delivery and with occupants in the homes is unfair. This part of the mobile home park was built in the 1970's with some of the lots having a sloping terrain. The PSC inspector told Stephen Johnson that the mobile homes would have to be removed from the lots even though there a tenants living in them so that the lots can be leveled. He suggested the use of retaining walls. In his report he only gave 30 days to accomplish this. It is physically impossible to do this in an existing park that already has utilities in place and mobile homes already on each side of the lot.

In conversations with the inspector and Mr. Freeman, they have not answered specific questions about how to resolve all of these issues or specific code violations. Instead they have referred me to manufacture installation guidelines and/or licensed installers. I have an estimate of \$ [REDACTED] per lot for removing homes from lots to pour concrete footings and resetting homes. This still does not address the issue of the sloping lots. Mo state statute 700.010 references the "Code" which seems to be the HUD code for manufactured housing installation. But as far as the HUD code, engineering reports have been submitted to Mr. Freeman stating the only deficiencies with the actual set-ups are improper tie downs and some minor holes in the skirting.

I think the state of Missouri would be better served if this enforcement was against manufactures shipping into the state. All the respondent was trying to do as a small business was to upgrade their existing mobile home park with new mobile homes.

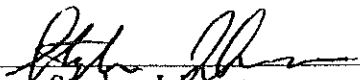
Respondent denies that they were engaged in the business of an installer. These homes were set-up by Chris Williams, Statewide Transport, [REDACTED].

Respondent asserts that under Missouri State Statute 700.010 that they are not a dealer by definition. **"Dealer"**, any person, other than a manufacturer, who sells or offers for sale four or more used homes or one or more new manufactured homes, or one or more new modular units in any consecutive twelve-month period;

To resolve this complaint respondent asks that the 4 mobiles homes that have been lived in be treated as used mobile homes and therefore they are in compliance. The new mobile home on lot 29 would be moved to lot 42 and set up by an licensed installer and decaled. Mr. Freeman also has an engineers report stating that the existing monolithic concrete slab will support said mobile home. If the 4 lived in mobile homes are determined to be new then respondent proposes that the mobile homes will be tied down per the submitted engineers reports and then considered compliant. Mr. Freeman advised respondent to retain an engineer and that the PSC manufactured home unit would accept said report.

Respondents submit this answer to complaint file no. MC-2025-0108. Respondents hope to to come to an early resolution to this complaint but request mediation if not.

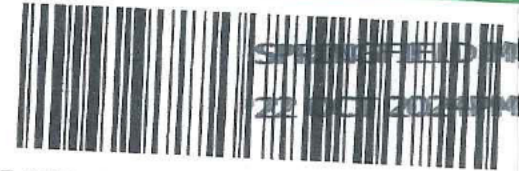
Answer for Stephen Johnson, Colony Cove, Inc, and Sequiota Investments, Inc.

  
Stephen Johnson  
10/22/24

Johnson



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