

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

The Manager of the Manufactured)
Homes and Modular Units Program of)
the Missouri Public Service)
Commission, Complainant, v.)
Stephen L. Johnson d/b/a Colony)
Cove, Inc. and/or Sequiota)
Investments, Inc., Respondent)

File No. MC-2025-0108

NOTICE OF EXTRA-RECORD COMMUNICATION

Issue Date: March 5, 2025

On March 5, 2025 an email was received by the Public Service Commission from Stephen Johnson. The letter was viewed by Chair Kayla Hahn, Commissioner Maida Coleman, Commissioner Glen Kolkmeyer, and Commissioner John Mitchell, as well as advisors Jamie Myers and Whitney Scurlock.

The Commission has promulgated rules denoted as the "Standards of Conduct" at 20 CSR 4240-4.020 and Section 20 CSR 4240-4.030 specifically deals with extra record communication. Since the email could be considered an extra-record communication under Commission Rule 20 CSR 4240-4.030, this notice of communication is filed in conformance with that rule. A copy of the email is attached to this notice.

Kayla Hahn

Chair Kayla Hahn,
Missouri Public Service Commission

Dated at Jefferson City, Missouri,
this 5th day of March, 2025.

Maida Coleman

Commissioner Maida Coleman,
Missouri Public Service Commission

Dated at Jefferson City, Missouri,
this 5th day of March, 2025.

Glen Kolkmeier


Commissioner Glen Kolkmeier,
Missouri Public Service Commission

Dated at Jefferson City, Missouri,
this 5th day of March, 2025.

John Mitchell

Commissioner John Mitchell,
Missouri Public Service Commission

Dated at Jefferson City, Missouri,
this 5th day of March, 2025.



Jamie Myers,
Advisor to Chair Kayla Hahn

Dated at Jefferson City, Missouri,
this 5th day of March, 2025.



Whitney Scurlock,
Advisor to Commissioner Glen Kolkmeyer

Dated at Jefferson City, Missouri,
this 5th day of March, 2025.

[REDACTED]

From: Steve Johnson [REDACTED]
Sent: Wednesday, March 5, 2025 9:55 AM
To: Wilson, Loyd; Hahn, Kayla; Kolkmeier, Glen; Coleman, Maida; Mitchell, John
Subject: PSC's illegal and unfair actions against Colony Cove MHP

Mr. Freeman became manager of the Manufactured Home dept. of the PSC in Oct 2023, six months or more after four of the mobile homes in question had already been installed. This is also after I had been told in March, 2023 by his dept., that I did not qualify as a dealer. Shortly after the PSC did their first inspection in June 2024, Mr. Freeman demanded that I become a registered dealer. He did so even after I pointed out to him that would be contrary to current state law that defines a dealer. Since I questioned his authority to demand me to do something contrary to state law, he has used his position to carry out his retribution for questioning his authority. Between loss rents, four engineering reports, attorneys costs, and a major loss on the mobile home that has been sold, our losses are at 35k+ and counting.

He told me if I obtained a positive engineers report on lot 42 that he would allow the home on lot 29 to be moved and installed. I obtained the report and he did not honor his word.

The PSC's mission is to protect the consumer. In this situation all of the defendants are the consumers. Maybe the PSC and Mr. Freeman should consider that the legislature worded the law the way they did because they realized that an entity purchasing new homes solely for the purpose of renting them were already the consumer. Travis Pringle with the PSC legal told me that they were lobbying the legislature to change the language as far as the definition of a dealer. In the mean time, Mr. Freeman should not be allowed to arbitrarily change the law as far as the definition of a dealer because he thinks it needs changing. Mr. Freeman told me that the manufactured home code referred to in MO state law is whatever he says it is. He has implemented a lot of enforcement changes since he took over but the law has not changed.

The PSC through Mr. Freeman is preventing a small Missouri business from upgrading an existing MHP with new mobile homes. His inspector told us that in order to install new mobile homes on some of the lots, we would have to install retaining walls. This is not physically possible in an existing mobile home park with utilities already in place. New mobile homes were allowed to be set up in this park on sloped lots without retaining walls in the past. The law has not changed since then just the manager of this PSC dept. Where is our rights as a small business and should not the grandfather law come into play. They are treating existing mobile home parks like consumers permanently installing double-wide's on acreage. Their PSC attorney through action in Greene county court had language that would have put Colony Cove MHP out of business. I do not think that the intent of the legislature was to penalize existing mobile home parks so severely. Since manufactured homes are designed as affordable entry level homes, how does adding a cost of 8-10k to the sale of every new mobile home in the state serve the consumer. This is the figure that mobile home dealers are telling me that they have to add on to every new mobile home sale to meet current PSC enforcement. Surrounding states are not doing this. I also do not think this was the intent of the legislature.

Our attorney told that us the PSC only has one year to inspect new mobile homes. Four of the five mobile homes in question had been installed for over one year when they were first inspected. Mr. Freeman, in his quest to punish Colony Cove mobile home park, is not following the laws and rules that he is legally required to follow. Apparently the PSC does not want any new mobile homes coming into the state other than to registered dealers. This would seem to be much easier and much more fair to enforce against the manufactures. They are all large Corporations that are out of state. Simple notify them they can only ship to registered dealers subject to a penalty. Instead Mr. Freeman chooses to show up at Colony Cove over a year after four homes have been installed and lived in to

inflict such financial pain to a Missouri small business that just wanted to upgrade their park. The one home that was lived in for a full year was sold at a major loss. But it was allowed by the PSC to be moved out of the park to be set up exactly the same way that it was set up in Colony Cove. We have been required to hire two different attorneys. One to answer filings in Greene county court and another for the administrative process in Jefferson City. I have been told this could go on for many months if not years. First you have to go through a lengthy administrative process before you eventually can end up in court for a final determination.

Sincerely,

Stephen Johnson

