

Janet Thome President Tiny House Alliance USA: PINS Complaint Regarding ICC 1215 Standard

BSR/ICC/THIA 1215-202x, Design, Construction, Inspection and Regulation of Small Residential Units and Tiny Houses for Permanent Occupancy (new standard)

ICC (International Code Council)

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New Standard

BSR/ICC/THIA 1215-202x, Design, Construction, Inspection and Regulation of **Small Residential Units** and Tiny Houses for Permanent Occupancy (new standard)

Stakeholders: Builders including tiny house builders, building code officials, building product manufacturers, architects, engineers, third-party plan review and inspection agencies, consumer advocates, homeowners and renters.

Project Need: Tiny houses are growing in popularity as communities look to address affordable housing issues and homebuyers are looking for new housing options. This standard will codify existing requirements for the design, construction, inspection and certification of SRUs and tiny houses used as permanent dwellings into a single standard and address identified gaps in available requirements for foundations and chassis. The 2021 International Residential Code (including Appendix AQ), and ICC/MBI Standards 1200 and 1205 will serve as the initial base documents with references to other existing standards.

Interest Categories: Manufacturer, Builder, Standards Promulgator/Testing Laboratory, User, Consumer, Government Regulator, Insurance

This standard will provide minimum requirements for the design, construction, inspection, certification, and regulatory compliance of small residential units (SRUs) and tiny houses used for permanent occupancy to assure public safety, sustainability, and resilience. The standard will include: consensus definitions for SRUs, tiny houses and related terminology; prescriptive and performance-based compliance methods for SRUs, tiny house foundations and chassis; and plan review, inspection, and certification requirements for SRUs and tiny houses constructed on-site and off-site. The standard will address SRUs and tiny houses built on a foundation and those with wheels and a permanent chassis intended for permanent occupancy. The 2021 International Residential Code (including Appendix AQ), and ICC/MBI Standards 1200 and 1205 will serve as the initial base documents with references to other existing standards. The standard will be written in mandatory code-intended language to support use by manufacturers and adoption by jurisdictions globally. This standard will not address SRUs or tiny houses used for temporary or seasonal occupancy, or tiny house community development or microgrids.

The standard was announced in ANSI Standards Action On May 16, 2025.

I see the new revised PINS announcement as both a positive and a negative.

Positives

- I have asked for ICC to submit a new revised PINS for the standard since Sept 2024 when I saw the standard change to the direction of the Small Residential Unit, but it was

denied. Finally ICC is following the ANSI policy that requires a Standard Developer to submit a new revised PINS to alert anyone materially affected by this change to the public through published notices if the standard is under development and has had a change of stakeholders or there have been substantive changes.

- The new revised PINS will give the industry a chance to weigh in on the Small Residential Unit and alert the tiny house industry.
- The entire committee will have to be dismantled and restructured because there is not one manufacturer on the committee building Small Residential Units, there are no building officials enforcing and approving the Small Residential Unit, there are no third parties certifying the Small Residential Unit, and there are no on site or owner builders building a Small Residential Unit, and no consumer that is buying this product as a voting committee member.
- ICC can no longer ignore complaints, they will be obligated to answer them.

SMALL RESIDENTIAL UNIT (SRU). A dwelling that is 1200 square feet (111 m²) or less excluding lofts and is constructed as a permanent residential structure with or without a permanent chassis system.

TINY HOUSE. A SMALL RESIDENTIAL UNIT that is 400 square feet (37 m²) or less excluding lofts.

The committee voted 10-2 for the proposed definitions. The reason is for the definitions to be consistent with the purpose and scope of the standard. This scope and purpose do seem to be in conflict with the title. Staff is discussing amending the title of the standard to include SRUs. ANSI permits title changes to standards as long as changing the title is not a substantive change.

Under presumption of the approval of the aforementioned motion, a second motion as follows:

Motion to use the **sole** term "SRU" when referring to all dwellings covered by this standard and to use the term "Tiny House" when referring to only those dwellings covered by the standard that are 400 square feet or less excluding lofts, except for the usage of "Tiny House" already established in the Title of the Standard and Section 101.2 Scope, Definition and where specifically relevant.

Motion passed unanimous.

Negatives

- Karl Aittaniemi the ICC Director Of Standards, with the support of the voting committee of OSMTH 1215 approved the April 2, 2025 meeting notes that had misinformation regarding ANSI requirements for a new revised PINS that stated; *"ANSI permits title changes to standards as long as changing the title is not a substantive change."*
Incorrect. ANSI does not address titles, and requires a new revised PINS when there are substantive changes or a change in stakeholders. I complained that he was putting out incorrect information to the public, and the meeting notes were approved anyway. The meeting notes were approved on May 15, 2025, one day before the new revised PINS was published in ANSI Standards Action. Karl did not tell us about the new revised PINS and even though several of us wanted to talk about the first ICC CAH hearing where the committee asked for disapproval of RB42-25, the code proposal that submitted the standard and had 100% opposition to the Small Residential Unit, they did not allow the discussion.

- Instead of ICC getting the standard in compliance with the original approved title, scope, and working group scopes that govern the draft and directing the standard back to the topic of tiny houses and to add provisions for the chassis, they have chosen to manipulate the standard toward the primary focus of the Small Residential Unit, a made up term that is not enforceable in a primary position over the codified term, Tiny Houses.
- We heard early on in the development of the standard that they want to get rid of the term Tiny Houses and get rid of Appendix BB Tiny Houses.
- ICC has chosen to ignore all the opponents that spoke out against the Small Residential Unit at the first CAH hearing on April 29, 2025 . There was not one proponent there speaking up for it.
- This new PINS revision cements that ICC is taking advantage of their position as a standard developer and further documents that the Small Residential Unit is the agenda of ICC and THIA, and the building officials on the committee.
- At a recent work group meeting after the CAH hearing on May 8, 2025, everyone spoke as if the Small Residential Unit would remain in the standard, and the Chair, Joshua Harmon stated that it was a good thing and there was even going to be a Large Residential Unit in the energy code, which confirms that ICC is just unfolding their plan to hijack the tiny house standard, because there is a not so hidden plan that was created behind doors that only a few are privy to.
- ICC has chosen to ignore all interested parties' objections to the Small Residential Unit in the public meetings and in public comments and now in the first CAH hearing.
- We only have 30 days to send our complaints to ICC, and one of the ANSI requirements of filing a new revised PINS, is-***You should also seek publication of the announcement of the proposed ANS activity in relevant trade publications and other suitable media in order to demonstrate the opportunity for participation by all directly and materially affected persons.*** There is no announcement by ICC as a press release, in ICC Building Safety Journal or anywhere on the THIA website, or Facebook or LinkedIn pages, so they have failed to alert the tiny house industry of their intention to add the Small Residential Unit in the title and scope of the standard, and place the Small Residential Unit in a dominant, primary position over Tiny Houses.

My PINS Complaint.

ICC is violating Antitrust Policies including their own, antitrust federal laws, multiple ANSI Essential Requirements, their own Code of Ethics, ICC Consensus Procedures, and Code Development Policies.

Violation # One

Co- Branding The Standard With The Tiny Home Industry Association (THIA) is giving THIA an incentive to vote in the direction ICC wants toward an agenda that was agreed upon behind closed doors by both organizations.

Violation # Two

Complaint Regarding David Tompos Sr.: There Are Now 3 Official Complaints On The Bullying Behavior Of David Tompos Sr. Whose Presence Has Been An Overreach Of ICC Representing Their Own Interests In The Standard Development.

David Tompos Sr. has misled the committee to justify the use of the term small residential unit. He is the VP of sales for ICCNTA, he is a voting committee member and was on the board of the Tiny Home Industry Association (THIA) for almost five years and has had undue influence in the standard development. ICC and THIA are co-branding OSMTH 1215 together after they jointly fought the approval of an ASTM Tiny House committee.

When ICC/MBI 1200 and 1205 were developed, David Tompos Sr. was the chair of the committee and he made the decision (MISTAKE) along with the committee to present the proposal to the 2024 IBC hearing in 2021 and has misled this committee to believe that the disapproval was because of tiny house terms when in actuality, it was proposed to the IBC, instead of the IRC as one reason, along with other multiple reasons that had nothing to do with tiny houses.

The IBC code applies to all buildings (including commercial) EXCEPT detached one- and two-family dwellings and townhouses up to three stories.

The IRC code applies to single and two-family dwellings and townhouses using prescriptive provisions.

Appendix AQ Tiny Houses (2021 IRC) And Appendix BB Tiny House (2024 IRC) applies to tiny houses used as single family houses.

Because everyone refers everything to David Tompos Sr., the committee has EXPANDED the myth that the tiny house terms were responsible for the disapproval of the ICC/MBI 1200 and 1205 and is the reason they feel the committee MUST use the term small residential unit(SRU). It is a complete fabrication - an agenda of David himself. No one stated at the G102-1 hearing that they thought tiny houses were RVs- but is what David Tompos Sr. has continued to say.

Violation # Three

WTO Coherence: Not To Duplicate Another Standard Developer: Violation Of The WTO Compliance Process 5. Coherence:

The International Codes and ICC standards are developed through a WTO-compliant

consensus-based process that is supported and embraced by the U.S. Government. ICC and states on their website that:

As proud strategic partners of the US Department of Commerce International Trade Administration, we actively support the various US Government initiatives that enable harmonization, reduce technical barriers to trade, and open markets to US manufacturers and service providers in the design and construction industry.

5. Coherence

In order to avoid the development of conflicting international standards, it is important that international standardizing bodies **avoid duplication of, or overlap with, the work of other international standardizing bodies**. In this respect, cooperation and coordination with other relevant international bodies is essential.

ICC is Duplicating The ASTM Tiny Houses Subcommittee Standards E06.26 Tiny Houses

The ICC board of directors approved the development of OSMTH 1215, even though they were well aware of the ASTM Tiny Houses E06.26 subcommittee.

The International Code Council and the Tiny Home Industry Association (THIA) that are co-branding ICC/THIA 1215 standard fought against a new ASTM Tiny House committee being developed for a YEAR even after we had the support of Colorado and New Hampshire with false claims of duplication, and that there was no need for any new standards, and it could not be a standard, in contradiction that they are developing a standard.

[Colorado State Representative Cathy Kipp](#)
[Colorado State Representative Chris Kennedy](#)
[New Hampshire State Representative Jim Maggiore](#)

The ASTM stakeholders followed all the requirements, and won every vote and milestone.

Both ICC And THIA were invited to participate from the beginning and their objections were given a year long due process.

There was a COTCO hearing that heard both sides, ICC attended and proponents for ASTM that resulted in the approval of activity of tiny houses, and resulted in a new subcommittee called Tiny Houses E06.26 within E06 Performance Of Buildings committee.

*The ICC/THIA disruption delayed the final approval of an ASTM E06.26 Tiny Houses within the E06 Performance Of Buildings and we overcame all their objections, and then ICC turned around months later and duplicated the standards and subject matter on Tiny Houses, but put out a **disingenuous press release stating;***

“The standard complements the work of ASTM’s recently established [E06.26 Subcommittee on Tiny Houses](#) by combining existing criteria for tiny houses used for permanent occupancy into a single, referenceable location. Ryan Colker, Code Council Vice President of Innovation, David Tompos, President of ICC-NTA, and Brad Wiseman, CEO and Board Chairman of THIA, are members of this ASTM subcommittee and will work alongside other members to ensure that the Code Council and ASTM efforts avoid overlap and complement each other, in addition to providing consistency and clarity for tiny house builders, code officials and municipalities on corresponding codes and standards.”

These are the very individuals that worked against the ASTM tiny house initiative and the name and scope of the ICC/THIA standard are already completely overlapping and will only compete with each other, not complement.

[ICC Press Release](#)

Excerpt From Letter From ICC To Janet Thome October 14, 2025

In response to a complaint/appeal letter that I sent to ICC, ICC stated;

“Several of the issues raised in the appeal letter you submitted on October 6, 2024, do Not appear to relate to a procedural action or inaction by ICC and therefore cannot be the subject of an appeal.

You may have other avenues in which to voice your concerns about those issues. **These include all your allegation that the standard duplicates an ASTM standard.”**

After their feedback, I answered their letter, and told them I was going to withdraw it to write it over, and asked what avenue they could give me to address my non-procedural complaints.

I never did get an answer from them, and then I received a letter from the ICC attorney that they were not going to allow me to appeal, except for one complaint.

I submitted the appeal, paid for it, and then they investigated, and their conclusion was I had nothing to appeal, without me getting a hearing, or allowing my voice to be heard.

[ICC Appeal Request Janet Thome](#)

[Amended Appeal Request From Janet Thome](#)

[October 14, 2025 Letter From ICC In Response To Appeal Request](#)

[October 16, 2025 Email To ICC](#)

[ICC Response To Janet Thome Regarding Appeal](#)

[Combined Appeals That ICC Has Refused To Grant Me](#)

NOTE: Number One Violation Was Submitted That Was Listed In My Combined Appeals. I submitted the appeal, paid for it, and then they investigated, and their conclusion was I had nothing to appeal, without me getting a hearing, or allowing my voice to be heard.

I did receive a refund after asking and complaining to ANSI.

ANSI Antitrust Policies

American National Standards shall be developed in accordance with applicable antitrust and competition laws and meetings amongst competitors to develop American National Standards are to be conducted in accordance with these laws.

Violation # Four

Joint Venture: ICC has created an illegal joint venture with THIA. While ICC and THIA had the ASTM committed stalled, they published their Joint Model Legislation. I objected to the ICC/MBI Model Legislation that both had the THIA and ICC logo displayed on it and complained to Cindy Davis, who was the President of ICC at the time, because in the ICC Antitrust Compliance Guidelines it states;

Background: The antitrust laws prohibit joint activity or agreements between persons and businesses that unreasonably restrains trade. Such agreements may be written, unwritten, informal, or even unspoken. Violations of the federal antitrust laws may be felonies, which (1) can subject an individual to imprisonment, and (2) can subject companies and individuals to substantial monetary fines, civil liability for treble damages, and injunctions

Guidelines: To minimize the antitrust risks of ICC Activities, including code and standards development, those participating in ICC Activities ("ICC Participants") should avoid even the appearance of discussing competitively sensitive information or reaching agreements that may harm competition. To this end, there should be no discussions, communications or agreements among ICC Participants regarding any of the following

ICC CP#50-21 Antitrust Compliance Guidelines

A joint venture of ICC and THIA was and is an illegal joint venture to control the tiny house market, and restrict trade. I complained to the rest of the board members, and was never answered.

The joint venture has not only been documented, but flaunted, and has ostracized the rest of the tiny house industry.

The ICC/THIA joint venture is also a violation of The Sherman Act that outlaws "every contract, combination, or conspiracy in restraint of trade," and any "monopolization, attempted monopolization, or conspiracy or combination to monopolize."

[ICC CP#50-21 Antitrust Compliance Guidelines](#)

ICC has refused to disclose their financial agreement or any other agreements with THIA and have refused to address the overabundance of THIA board members and close associates.

Violation # Five

Vote Stacking: An Antitrust Violation

The committee has only 18 voting members. One third are government officials. They have filled the rest of the committee with THIA board members and close associates, including David Tompos Sr. who is paid staff of ICC, and a board member of THIA.

Note: *He recently resigned from THIA, however he was on the board of THIA for almost 5 years, and was on the board when all the decisions were made regarding opposing the ASTM Tiny House Initiative, the OSMTH 1215 and the direction of the standard.*

The OSMTH 1215 has stacked the vote and that is against antitrust laws. The outcome and direction of the standard, and the base documents were all decided by THIA and David Tompos Sr. and the highest executives of ICC and the vote is rigged.

To compound the dominance in 1215 is the fact that the committee has 9 representatives of THIA, either as board members, paid staff, and one is associated with a THIA board member that are both employed by the same company. This is over the allowance of one organization.

ICC has refused to address this issue.

Violation # Six

Tying Agreements: ICC is creating tying agreements with their standards and services.

ICC advertises as the One Stop Shop and are bundling the ICC 1200 series.

Violation # Seven

Writing The Standard So The Standard Developer Benefits

The Small Residential Unit is the agenda of ICC to benefit all their services.

ICC Long Beach Webinar: The SRU Originates From ICC

What is most disturbing is that the small residential unit seems to be a term that originated from ICC and THIA as documented by the ICC webinar at the ICC 2024 in Long Beach. The description of the webinar stated;

Approving Small Residential Dwelling Units: ADUs and Tiny Homes

Instructor: Ryan Colker

Some homeowners and renters are looking to go small to enhance affordability or generate additional income. What does that mean for state and local jurisdictions that need to review and approve such structures? This session will review several emerging small dwelling units including accessory dwelling units (ADUs) and tiny houses, what provisions apply and how various jurisdictions are applying multiple strategies including building codes, zoning codes and other strategies to help support their use.

[Source](#)

Violation # Eight

Refusing To Deal: I Have Been Singled Out As An Interested Party That ICC Will Not Deal With.

Tiny House Alliance USA is a competitor of THIA, and I have been continually singled out and treated as someone that ICC, Karl, Jonathan Paradine, and others will not deal with, including not allowing me to appeal, instructions from the co-chair not to engage with me to other committee members, and blocking me from speaking at a meeting on certain topics that were relevant in violation of 3.5 CP#50-21. I have also been denied my right to appeal in violation of ICC Consensus Procedures, ANSI, and federal laws in a standard development setting.

A building official on the committee refused to engage with me and did not even stand up for a law in his own state and declared he would not engage with me while I was pursuing legal action, I was pursuing a potential appeal, which is a right given to each interested party according to ICC Consensus Procedures And ANSI, not a legal action.

ANSI Essential Requirements For Due Process;

Violation # Nine

1.2 Lack Of Dominance: The standards development process shall not be dominated by any single interest category, individual or organization. Dominance means a position or exercise of dominant authority, leadership, or influence by reason of superior leverage, strength, or representation to the exclusion of fair and equitable consideration of other viewpoints.

The standard is dominated by ICC, THIA, David Tompos Sr, An Overabundance Of Manufacturers Interest Category, and the building officials chosen to implement their agenda.

ICC has refused to address our complaints regarding domination in the committee.

Violation # Ten

1.3 The standards development process should have a balance of interests. Participants from diverse interest categories shall be sought with the objective of achieving balance. If a consensus body lacks balance in accordance with the historical criteria for balance, and no specific alternative formulation of balance was approved by the ANSI Executive Standards Council, outreach to achieve balance shall be undertaken.

The committee is completely unbalanced, without diverse interest categories. The standard was supposed to include both off-site and on-site provisions, but there are ZERO on site or owner builders that are representing the interests of that category. It is imbalanced with manufacturers, and imbalanced with THIA board members and close associates, and the overreaching influence of David Tompos Sr., and the Standard Development Organization.

ICC has refused to correct and balance the committee.

Violation # Eleven

1.4 Coordination And Harmonization: Good faith efforts shall be made to resolve potential conflicts between and among existing American National Standards and candidate American National Standards.

Both ICC and THIA did not make good faith efforts and ignored the initial collaboration I set up early on with Mark Johnson and Karl when ASTM Tiny Houses was in the discovery phase.

Violation # Twelve

1.6 Considerations Of Views And Objections. Prompt consideration shall be given to the written views and objections of all participants, including those commenting on the PINS announcement or public comment listing in Standards Action.

Complaints and objections are rarely addressed and my first PINS objection was not given due process and was dismissed. The Small Residential Unit is the agenda of ICC and all objections have been ignored.

Violation # Thirteen

1.8 Appeals. Written procedures of an ANSI-Accredited Standards Developer (ASD) shall contain an identifiable, realistic, and readily available appeals mechanism for the impartial handling of procedural appeals regarding any action or inaction. Procedural appeals include whether a technical issue was afforded due process.

ICC has denied my right to appeal and have stated they also will not answer any more complaints. They never answered my complaints so nothing has really changed.

Violation # Fourteen

3.0 Normative American National Standards Policies

3.2.1 Contractual Requirements. Except as provided below, ANS shall not include contractual requirements such as those relating to particular products or services, guarantees, warranties, reworks, indemnities, buybacks, price-related terms and other conditions of sale or use.

David Tompos Sr. tried to force the provisions of ICC owned ICC/MBI 1205 as a condition of the standard and boycotted a competitive ASTM standard to all the committee voting members.

ANS shall not endorse or require the purchase or use of proprietary products or service providers as a condition of implementing the standard. Proprietary in this context means products or services that are the property of an owner and cannot be obtained or

recreated without the consent of the owner. For example, an ANS may not endorse or require the purchase or use of brand-name tools or components, licenses, manufacturer lists, service provider lists or copyrighted materials.⁸

However, for informational purposes, where known sources exist for products or services necessary to comply with the ANS, it is permissible, but not obligatory, to identify the sources (which may include a source's name and address) in a footnote, an appendix, or reference to a website. The referenced products or services shall be reasonably available from the referenced sources, the words "or the equivalent" shall be added to the reference, and the reference shall also expressly state that identification of products or services is not an endorsement of those products or services or their suppliers.

David Tompos Sr. tried to force the provisions of ICC owned ICC/MBI 1205 as a condition of the standard and created a group boycott of a competitive ASTM standard.

ICC has falsely classified their voluntary standards as ‘requirements.’

Violations Of ICC Policies

Violation # Fifteen

Code Of Ethics:

I have been disparaged in meetings, blocked from conversations, bullied, ignored, interrupted, and ICC and voting committee members failed to answer, and withheld information that should have been public, and were not honest.

Violation # Sixteen

Project Team: The Project Team Failed To Monitor Attendance, Conflicts Of Interests, Or Objections.

We have continuously asked who Project Team is besides Karl, and no one answers us.

Violation # Seventeen

ICC Consensus Procedures: Failure To Answer Complaints In Writing In 30 Days:

See Attached Complaints That Were Never Answered. 99% Of All Complaints Have Been Ignored.

[Complaints And Emails To ICC From Janet Thome Not Answered](#)

Violation # Eighteen

[Code Correlation: See Attached Complaint.](#)

Violation # Nineteen

Failure To Disclose And Conflicts Of Interest.

G195-25 Part I And Part 2 are the code proposal agenda titles for ICC/MBI 1200 and 1205 for the submission to the IRC and IBC for 2027.

Two of the proponents of the code proposal are voting members of OSMTH 1215- Jay Richards and the chair is Jonathan Paradine. It is an absolute conflict of interest that they are proponents of 1200 and 1205, and on the 1215 committee, because they obviously are not objective, proven by their actions. This compounds and adds to my previous complaints regarding:

- The Blocking Of A Certification Work Group By The Chair And Committee
- David Tompos Sr. Has Been Aggressive In The Committee And Has Tried To FORCE 1205 As Provisions In The Standard.
- The Long Beach Webinar

Regarding: Complaint Regarding Joshua Harmon, Building Code Specialist, Columbus, Ohio, Jay Richards, Construction Codes Administrator, Reynoldsburg, Ohio, and ICC Board Of Directors, Mike Boso, Chief Building and Zoning Official, Grove, Ohio,

Three Ohio Building Officials Supporting The International Code Council Monopoly In The OSMTH 1215 Committee On Tiny Houses And Code Proposal G195- I and II For The 2027 IRC And IBC And Antitrust Violations.

Jay and Joshua are voting members of ICC OSMTH 1215 committee on tiny houses. The committee is developing a standard called [ICC/THIA Standard 1215: Design, Construction, Inspection and Regulation of Tiny Houses for Permanent Occupancy.](#)

Jay and Joshua, and Mike are representing the state of Ohio and have participated in antitrust violations in this standard development setting, is violating the federal color of law, and is violating Ohio state laws of professional ethics, conduct, non-disclosure of conflicts of interest, they have not maintained impartiality, they have not followed ICC Consensus Procedures, the ICC Code Of Ethics, and ICC Antitrust Policies, and they has been not been honest and forthcoming.

Jay, Joshua, and Mike have colluded with ICC and the Tiny Home Industry Association (THIA) and created an agenda behind closed doors for the standard in violation of openness and transparency.

Violations In OSMTH 1215: He Has

For More Context, See Open Letter To ICC

- 1) Jay and Joshua willfully participated in the ICC agenda to hijack the tiny house standard with the agenda of a Small Residential Unit, a made up term that no one is using, or is enforceable to be in a primary position, over the codified term, tiny houses, in the standard.
- 2) Jay did not disclose that he is a proponent of a code proposal that was submitted to the 2027 IBC and IRC title G195- I and II that is referencing the ICC/MBI 1200 series, including 1205, the standard ICC is trying to FORCE on the tiny house industry for certification, This is a blatant conflict of interest, and unethical, and violated his duty to disclose a conflict of interest. The code proposal also includes false information regarding that there will be no cost increase. That is false, if a third party has to change over to the provisions for certification for ICC/MBI 1205, it will require a cost for new training, quality assurance, and more and the cost will be passed down to the manufacturer, and then passed down to housing. It also includes 100% plant inspection and certification that also increases the cost.
- 3) I asked for a certification work group for one year. Jay and Joshua stayed silent on the subject, because they knew that Ohio is possibly the next state to adopt the ICC/MBI 1200 series, including 1205 on certification.
- 4) Joshua and a few others of the OSMTH 1215 committee, including Karl Aittaniemi, the ICC director of standards, creating a secret fractured hierarchy in the committee, and plotted and planned a code proposal submittal titled RB42-25 that included referencing the ICC standard without a motion of the committee, leaving out a few voting committee members, interested parties, and the public. See attached complaint.
- 5) Both Jay and Joshua watched me ask for two meetings before the CAH # 1 that just occurred in Orlando, Florida about the RB42-25 code proposal, and they said nothing. A group of interested parties almost spent thousands of dollars to travel to the first ICC CAH hearing in Orlando, Florida that starts on April 27, 2025. We were also paying a professional code expert to testify as an opponent to RB42-25, a code proposal that also referenced ICC/THIA Standard 1215, Design, Construction, Inspection and Regulation of Tiny Houses for Permanent Occupancy developed by OSMTH 1215. We did not end up sending the code expert there because he told us that the committee was going to go to the hearing and ask for disapproval. It ended up being Joshua Harmon. But they hid their strategy from us. Joshua asked for disapproval because the standard is still being developed. Joshua is not a listed proponent of the standard and he used

the term “we” in the discussion, obviously on behalf of OSMTH1215 as a committee decision.

- 6) Jay and Joshua are clearly participating in the committees and code proposals, so ICC, and their subsidiaries gain market control to benefit ICC selling their standards, and with the adoption of ICC/THIA 1205, ICCNTA and IAS also benefit. Compliance with ISO standards, which are requirements in 1205, which then require ICC inspectors. They are helping ICC require illegal tying agreements.
- 7) They are helping to facilitate a barrier to entry not only with third parties through ICC/MBI 1205, but are participating in squeezing out small manufacturers with the Small Residential Unit ICC agenda.
- 8) David Tompos Sr. , VP of sales of ICCNTA, voting member of OSMTH 1215 created a group boycott of ASTM E541, a competitive standard to ICC/MBI 1205. David circulated a letter to the entire committee, and me, and Jay and Joshua did nothing about it. ASTM E541 is a statutory requirement in over 10 states for third parties and is the requirement for third parties that inspect and certify manufactured homes. There is a committee member that is a third party that meets the requirements of ASTM E541 and the company certifies every manufacturer on the committee, but all but one company is also on the board of THIA, or they are associated by the same company that is on the board of THIA. THIA is co-branding the standard with ICC.
- 9) The committee is vote stacked with THIA board members and close associates, and they ignored all complaints regarding this subject.
They have been involved in price fixing by way of conduct to collude with ICC and THIA, a trade association that has their own marketing page on the ICC website, showcasing their joint publications to implement their plan to usher in the Small Residential Unit, and block ASTM E541. The Modular Building Institute are also proponents of G195-Part I And II that are referencing the ICC/MBI 1200 standards. (1200, 1205, And 1210).
- 10) The standard development has not been open, transparent, or inclusive as required by ANSI and federal laws.

Complaint Regarding ICC Board Of Directors, Mike Boso

I have sent official complaints to the ICC Board Of Directors, that included Mike Boso, for over a year, and 99% of the complaints have been ignored. They have ignored my complaints that they are violating;

Complaint Regarding The OSMTH 1215 Chair, Jonathan Paradine

Regarding: Complaint Regarding Jonathan Paradine, Michigan State Administrative Manager At The Bureau Of Construction Codes Collusion With ICC, THIA, And MBI To Support The International Code Council Monopoly In The OSMTH 1215 Committee On

Tiny Houses And Code Proposal G195- I and II For The 2027 IRC And IBC And Antitrust Violations.

Jonathan Paradine Violations In OSMTH 1215: He Has

For More Context, See Open Letter To ICC

- 1) He has willfully participated in the ICC agenda to hijack the tiny house standard with the agenda of a Small Residential Unit, a made up term that no one is using, or is enforceable to be in a primary position, over the codified term, tiny houses, in the standard.
- 2) For one entire year I asked for a certification work group. The first time I asked, Jonathan said he would be the chair, but David Tompos Sr. insisted that ICC/MBI 1205 had to be the provisions for certification. There are now 3 official complaints regarding the behavior of David Tompos Sr., who is the VP of sales for ICCNTA, a paid staff member of ICC, a voting member of the committee, and was on the board of THIA. I continued to ask for a certification work group, and Jonathan tried to block my conversation about it, and then taunted me in a meeting, and asked if I wanted to bring something to a motion, and after I said yes, I would like a work group on certification, and then he said NO. The subject matter was finally thrown in with another work group, but ICC did nothing about the bullying behavior of David Tompos Sr. If you research the committee meeting notes, you will see that it was listed several times that a certification work group was requested.
- 3) Jonathan did not disclose that he is a proponent of a code proposal that was submitted to the 2027 IBC and IRC title G195- I and II that is referencing the ICC/MBI 1200 series, including 1205, the standard ICC is trying to FORCE on the tiny house industry for certification, This is a blatant conflict of interest, and unethical, and violated his duty to disclose a conflict of interest. The code proposal also includes false information regarding that there will be no cost increase. That is false, if a third party has to change over to the provisions for certification for ICC/MBI 1205, it will require a cost for new training, quality assurance, and more and the cost will be passed down to the manufacturer, and then passed down to housing. It also includes 100% plant inspection and certification that also increases the cost.
- 4) He allowed me to be disparaged by Joseph Sollud in a public call and said nothing.
- 5) He and a few others of the OSMTH 1215 committee, including Karl Aittaniemi, the ICC director of standards, creating a secret fractured hierarchy in the committee, and plotted and planned a code proposal submittal titled RB42-25 that included referencing the ICC standard without a motion of the committee, leaving out a few voting committee members, interested parties, and the public. See attached complaint.
- 6) For 2 weeks on the calls, I asked questions about RB42-25, but he and Karl blocked the discussion about it and stated they did not submit it. This is a

violation of an antitrust law not to have non-public strategy plans. The main proponent is the vice chair.

- 7) He has ignored requests to bring the standard back to compliance of the approved title, scope, and working group scopes, and would not allow my request to speak about how the draft was out of compliance with working draft scopes that should govern the draft.
- 8) I have been singled out as a person that both ICC and Jonathan will not deal fairly with, which is both an ANSI and Antitrust violation.
- 9) He has shown very little independence of mind, and it is obviously a building official that ICC can count on that will vote the direction that ICC wants him to, as he is asked frequently to be on the committees.
- 10) He is clearly participating in the committees and code proposals, so ICC, and their subsidiaries gain market control to benefit ICC selling their standards, and with the adoption of ICC/THIA 1205, ICCNTA and IAS also benefit. Compliance with ISO standards, which are requirements in 1205, which then require ICC inspectors. He is helping ICC require illegal tying agreements.
- 11) He is helping to facilitate a barrier to entry not only with third parties through ICC/MBI 1205, but is participating in squeezing out small manufacturers with the Small Residential Unit ICC agenda.
- 12) David Tompos Sr. created a group boycott of ASTM E541, a competitive standard to ICC/MBI 1205. David circulated a letter to the entire committee, and me, and Jonathan did nothing about it. ASTM E541 is a statutory requirement in over 10 states for third parties and is the requirement for third parties that inspect and certify manufactured homes. There is a committee member that is a third party that meets the requirements of ASTM E541 and the company certifies every manufacturer on the committee, but all but one company is also on the board of THIA, or they are associated by the same company that is on the board of THIA. THIA is co-branding the standard with ICC.
- 13) The committee is vote stacked with THIA board members and close associates, and he ignored all complaints regarding this subject.
- 14) He did not know who the Project Team was for the committee, which is a requirement, and ignored all my continued questions regarding this team as required by ICC Consensus Procedures which handles conflicts of interest, attendance, and more from the committee.
- 15) He has been involved in price fixing by way of conduct to collude with ICC and THIA, a trade association that has their own marketing page on the ICC website, showcasing their joint publications to implement their plan to usher in the Small Residential Unit, and block ASTM E541.
- 16) The standard development has not been open, transparent, or inclusive as required by ANSI and federal laws.
- 17) He has participated in the refusal of a new pins notification in ANSI Standards Action after the standard changed the direction to the Small Residential Unit.
- 18) He ignored my complaint regarding the October 2024 Long Beach expo that previewed the first draft of the standard and had a webinar on the subject of the

compliance of Small Residential Units that included tiny houses and ADUs. This was the exact same time he blocked the certification work group.

- 19) Another conflict of interest. Modular Building Institute (MBI) Government Affairs Director, Jon Hannah-Spacagna, has been asked to serve as an advisory member with the Michigan Bureau of Construction Codes to consider adoption of ANSI 1200 and 1205, which would provide more efficiencies within their modular program, while also allowing for the use of third party inspection agencies. The ICC/MBI 1200 and 1205 standards were co-branded with ICC and MBI, and Jon Hannah-Spacagna is the main proponent of G195- I and II, along with Jonathan that is submitting the standards for reference in the 2027 IRC and IBC, and that was a failure of disclosure of both their relationship and the undisclosed plan of the code proposal, while Jonathan blocked the certification work group.
- 20) The committee used seed chapters of ICC/MBI 1200 and 1205 and tried to paint the voluntary standards as requirements as stated in their [press release](#).
- 21) On recent calls, it was announced by Karl, the director of standards, that ICC was considering changing the title of the standard to include the Small Residential Unit, which is a clear manipulation of the standard, instead of bringing the standard back into compliance with the original intent, with his support and without objection.

The draft is currently voting on public comments, and instead of allowing ASTM E541 as an option to be adopted for certification, they are removing the provisions of ICC/MBI 1205 as mandatory, though they will still bundle the 1215 standard with the other 1200 series, creating tying agreements with the standards and the services of ICC.

Violation # Twenty

Non Public Future Strategy Plans

Regarding: Complaint: Violation Of ICC Antitrust Policy CP# 50 Non -Public Forward Strategic Plans: Regarding OSMTH 1215 And The Small Residential Unit, A Secret Fractured Hierarchy Of Select Committee Members Withholding Information From The Committee, Interested Parties, And The Public, And The Manipulation Of The Standard To Benefit ICC And ICC Subsidiaries To Usher In The Small Residential Unit: The Not So Hidden Agenda To Replace Manufactured Homes So The Inspection, Certification, And Regulatory Compliance Is Under The Umbrella Of ICC, Squeezing Out Small Tiny House Manufacturers.

A group of interested parties almost spent thousands of dollars to travel to the first ICC CAH hearing in Orlando, Florida that starts on April 27, 2025. We were also paying a professional code expert to testify as an opponent to RB42-25, a code proposal that also referenced

ICC/THIA Standard 1215, Design, Construction, Inspection and Regulation of Tiny Houses for Permanent Occupancy developed by OSMTH 1215.

A few days ago, we were lucky to be told that Jonathan Paradine, the chair of OSMTH1215 was asked to testify and ask for disapproval of RB42-25 at CAH # 1.

We were also told it would be considered bad form, if opponents testified after they asked for disapproval and that no one from the Tiny Home Industry Association (THIA) will be there, and no other testimony is anticipated for or against.

I just listened to the hearing and it ended up being Joshua Harmon, who spoke on behalf of the OSMTH 1215 committee.

Joshua asked for disapproval because the standard is still being developed. Joshua is not a listed proponent of the standard and he used the term “**we**” in the discussion, obviously on behalf of OSMTH1215 as a committee decision.

The OSMTH 1215 committee, including Karl, the ICC Director Of Standards, failed to be open in their plan for the standard to be submitted as a code proposal to a few OSMTH 1215 voting committee members, interested parties and the public.

We canceled our plans.

The Goal Of OSMTH 1215

At the first meeting regarding the standard, we were told that a first draft had to be completed by Jan. 2025 and all timelines have been followed to be ready for the CAH hearings. It is written in mandatory language so it could be submitted to the IRC, and a primary goal was to add provisions for the chassis, which was not allowed 7 years ago, in the tiny house code, now known as Appendix BB Tiny Houses in the 2024 IRC.

First OSMTH 1215 Meeting Notes: Discussion Of The Work Plan

A draft work plan has been created with input from the chair and vice-chair.

The purpose of the work plan is to guide the committee work with the expectation of completing the standard and having it published & readily available.

If it is intended for reference in the 2027 Group B I-Codes a consensus a consensus draft must be completed and submitted with the code change proposal by January 2025 for code committee consideration.

In January 2025, The Vice Chair And Chair Continued The Work Plan And It Was Decided Behind Closed Doors That Brad Weisman, The Vice-Chair And A Few Proponents Privy To The Plan Would Submit The Standard For Reference In RB42-25 Code Proposal. This Action Was Taken Without A Motion From The Entire Voting Committee And Disclosure To Interested Parties And The Public Creating A Non-Public Forward Strategy Plan In Violation Of CP#50-21 Antitrust Policy 3.8 Non-public information. It Was Secretly Decided That A Committee Member Of OSMTH 1215 Would Ask For Disapproval At The First CAH Hearing While Blocking Open Discussion In The Scheduled By Weekly Meetings Also In Violation Of ANSI Essential Requirements.

Work Plan: Meeting Notes From First Meeting January 31, 2024

3. Discussion of the work plan:

'A draft work plan has been created with input from the chair and vice-chair. The purpose of the work plan is to guide the committee work with the expectation of completing the standard and having it published & readily available. If it is intended for reference in the 2027 Group B I-Codes, a consensus draft must be completed and submitted with the code change proposal by January 2025 for code committee consideration.'

[OSMTH 1215 Meeting Notes January 31, 2025.](#)

RB42-25 Code Proposal

The proponents of RB42-25 includes several voting members of OSMTH 1215, and the main proponent is Brad Weisman, the CEO of THIA and the co-chair of OSMTH1215. There was only one proponent that is not a voting member of the committee, but she works for the same company that is a voting member, that is associated with another person that works for the same company, and is also on the board of THIA.

We were puzzled that the code proposal did not include the chassis, or correlate well with the standard, and the definitions were in conflict with each other.

We reached out to the proponents with questions, but they did not answer.

March 19, 2025 OSMTH 1215 Meeting

I asked about RB42-25 at the March 19th meeting, and it was the appropriate time, because there was a big debate about definitions of the Small Residential Unit and Tiny Houses.

Jonathan Paradine told me the committee did not submit the code proposal and that it could be the same people, but that the committee did not submit it.

There was no more discussion about the code proposal.

April 2, 2025 OSMTH 1215 Meeting

In the April 2, 2025 meeting, Brad Weisman brought up the code proposal and the ICC staff analysis, and right after I started to ask questions, and both Jonathan, and Karl Aittaniemi, the Director of Standards told me the committee did not submit the code proposal and perhaps I should seek out the advice from the ICC code development team, and they tried to block me from speaking about it.

It is disturbing that they would allow Brad to bring up the code proposal, but not me.

I reached out to Beth Tubbs regarding RB42-25, but she did not reply. I do understand she is quite busy at this time and she was probably instructed not to answer me.

[Email To Beth Tubbs](#)

As respectfully as I could, I stated that I must insist they let me ask questions, because we were trying to make travel plans for the code hearings. They finally let me speak. I and several others were completely confused. Was there a different code proposal for the submission of the standard that the committee submitted? An interested party spoke up and stated he thought that RB42-25 would be heard on Monday, April 28, 2025. Finally they let me speak.

No One Will Answer Our Inquiries Regarding RB42-25

The Proponents Will Not Answer

OSMTH 1215 Has Tried To Block The Discussion Of The Code Proposal On The By Weekly Calls

Beth Tubbs Failed To Answer

Complaints To The ICC Board Of Directors Are Not Answered

The OSMTH 1215 Did Not Disclose The Submittal Of The Standard To The IRC

Where is an interested party supposed to receive accurate information regarding the submission of the standard to the IRC if no one answers us?

Hierarchy Within The Committee

The OSMTH 1215 committee has not been forthcoming regarding the plans for the code proposal, their strategy for the submission of the standard to the IRC, and the committee is fractured into a hierarchy, leaving even committee voting members in the dark, and interested parties, with only a few privy to the plan, violating an open consensus process for transparency.

The Off-Site Modular Construction Standards Committee That Promulgated ICC/MBI 1200 and 1205

I attended one meeting when 1200 and 1205 were being drafted, and the entire committee was involved in the submittal of the code proposal to reference the standards to the IBC, and their strategy was well documented in the meeting notes, including BCAC meetings, and the decisions for the code proposal and the standard submission was decided through motions from the committee. The vice-chair of the committee was the main proponent of the standard.

The open strategy included all the information regarding the hearings in the meeting notes for their code proposal submission of G102.21.

This is in stark contrast to the way that OSMTH 1215 is conducting decisions that are being made by THIA, ICC, and Jonathine Paradine, the chair of the committee behind closed doors, though in the open meetings, they are not disclosing the plans.

Violation Of CP#50-21 – Antitrust Compliance Guidelines

I have continually brought up the antitrust violations in my complaints, which are ignored, and never addressed. There are two that I want to focus on currently.

3.0 Guidelines: To minimize the antitrust risks of ICC Activities, including code and standards development, those participating in ICC Activities (“ICC Participants”) should avoid even the appearance of discussing competitively sensitive information or reaching agreements that may harm competition. To this end, there should be no discussions, communications or agreements among ICC Participants regarding any of the following:

3.5 Terms on which any ICC Participant will or will not deal with particular competitors, suppliers, distributors, or customers;

Tiny House Alliance USA is a competitor of THIA, and I have been continually singled out and treated as someone that ICC, Jonathan Paradine, and others will not deal with, including not allowing me to appeal, instructions from the co-chair not to engage with me to other committee

members, and blocking me from speaking at a meeting on certain topics that were relevant in violation of 3.5 CP#50-21. I have also been denied my right to appeal in violation of ICC Consensus Procedures, ANSI, and federal laws in a standard development setting.

[Letter From ICC Attorney](#)

3.8 Non-public information regarding market shares or forward-looking strategic Plans.

[CP#50 Antitrust Compliance Guidelines](#)

[Open Letter To The International Code Council From Janet Thome](#)

[Folder Of Complaints And Emails To ICC: 99% Unanswered](#)

Closing Thoughts

Remedial Actions

- Dismantle The Entire Committee And Get The Committee In Balance Without Domination
- Open Up Your Relationship To The Entire Tiny House Industry Instead Of The Exclusive Relationship To THIA
- Disban The Hierarchy Not So Secret Group Within The Committee That Is Implementing The ICC Agenda And Creating Non Public Forward Strategy Plans
- Remove The Overreach Of The SDO Influence
- Stop Allowing A Hostile Environment In The Meetings
- Announce Who The Project Team Is
- Answer Our Complaints
- Remove The Small Residential Unit Hijack Of The Standard
- Withdraw The Standard If You Do Not Intend To Represent The Needs Of The Tiny House Industry
- Give Time On The Calls For Other Business Besides Public Comments
- Address The Poor Attendance
- One Member Is Showing Up For Roll Call And Then Leaving And Is Not There To Vote
- Choose New Voting Members That Have Technical Experience
- Follow Antitrust Laws And All ICC Policies

This complaint and comments are my own and I do not represent ASTM International on any level.

Thank you for the consideration of my views,

Janet Thome President
Tiny House Alliance USA
janet@tinyhouseallianceusa.org