

April 29, 2025

ICC Board Of Directors  
International Code Council  
200 Massachusetts Ave NW  
Washington, DC 20001

**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](#)

### **Code Of Ethics**

The development of OSMTH 1215 has not been developed with integrity and the committee members have violated the code of ethics all throughout the development of the standard.

[ICC Code Of Ethics](#)

*The working plan of OSMTH 1215 as documented by the first meeting notes had a goal to submit the standard for the inclusion of the 2027 IRC, but certain voting members took it upon themselves to create non-public forward- looking strategic plan for RB42-25 and the standard and did not disclose the plans to the entire voting committee or interested parties in violation of 3.8 CP#50-21 and have kept their intentions and decisions private.*

*After the CAH hearing, who will decide the strategy of the submission of the standard through a code proposal for the next CAH hearing? Will it be the same proponents that submitted RB42-25 that decide the direction privately among themselves, leaving part of the voting committee and interested parties in the dark, while privately planning with Jonathon, the chair, Brad, David Tomps Sr. and Karl, or will the working plan be brought back into compliance with all applicable ICC and ANSI policies and antitrust laws?*

**The Small Residential Unit ( SRU) Is An ICC Agenda**

The SRU is the obvious agenda of ICC to replace the manufactured home so the inspection, certification, and regulatory compliance is under the umbrella of ICC, which means less auditing from [IBTS](#), that audits the third parties that certify manufactured homes, including ICCNTA. It is actually not a bad idea, except it has no place in a tiny house standard. Manufactured homes sadly still have a stigma of trailer parks.

David Tompos Sr, VP Of Sales For ICCNTA, voting committee member of OSMTH 1215, and board member of THIA for almost 5 years, including the time when the standard was initially approved by the ICC board of directors, and when all voting members were selected, circulated a document to all voting committee members and myself to create a group boycott of ASTM E541, which included a negative bias toward IBTS audits. ASTM E541 is the personal requirements for IPIA and DAPIA third parties that certify manufactured homes and is a statutory requirement in over 10 states for third parties, which will supersede ICC/MBI 1205.

### Meeting Notes From March 19, 2025

03-02-24 – Discussion of definitions for small residential units and tiny house.

A motion was brought forth to modify, clarify and affirm the definitions as described below:

**SMALL RESIDENTIAL UNIT (SRU).** A dwelling that is 1200 square feet (111 m<sup>2</sup>) 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 m<sup>2</sup>) or less excluding lofts.

Extended discussion - All of these units have to be dwelling units. Some people felt that this is not clear in the current proposed definitions. Should a tiny house should be a subset of small residential units, or should tiny houses and SRU be separate? Is this a conflict with the scope of the standard? 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.

[Link To Meeting Notes](#)

### Why Has It Been Concluded That The SRU Is An ICC Agenda?

- **October 2024 Long Beach, Ca.** Expo Webinar Shared The First Draft Of OSMTH 1215 And Had A Webinar On Approving Small Residential Dwelling Units That Included ADUs And Tiny Homes.
- The Hierarchy Within The Voting Committee Is Manipulating The Standard, With The Help Of Jonathon, the chair, the vice chair, and Karl Aittaniemi, the Director Of Standards, With The Blessing Of The ICC Board Of Directors And THIA, Who Is Co-Branding The Standard With ICC.
- **Jan.10, 2025 Deadline To Submit A Code Proposal:** RB42-25 Proponents Had To Submit By That Date, But There Was No Discussion In The Meetings Regarding The Topic When They Did This And RB42-25 Including Referencing The Standard.

- **February 21, 2025:** RB42-25 Was Re-Submitted On The ICC Website In CP Access. Oddly, The Proposal Omitted The Chassis From The Definition Of The SRU, Nor Did It Add The Chassis To Appendix BB Tiny Houses. The January Proposal Was Analyzed By ICC Staff And Then Re-Submitted To Cp Access After The ICC Analysis.
- **End Of February:** As Announced By ICC, The code change proposals for Group B codes will be viewable on [cdpACCESS](#) by the end of February 2025.
- **March 3, 2025:** The Meeting Discussed The Definitions Of The Small Residential Unit And Tiny Houses And It Was Decided At The Next Meeting There Would Be A Vote.
- **March 19, 2025:** In The Middle Of Approving Public Comments, A New Motion Passed To Remove The Chassis From The Definition Of The Standard. The Meeting Notes Also Stated: ***This scope and purpose do seem to be in conflict with the title.***
- **April 2, 2025:** Karl Stated That Staff Is Discussing Amending The **Title** Of The Standard To Include SRUS Because Of ‘**Confusion**’ We Are Not Confused. Why Is ICC Staff Involved In This Decision At All? Karl, Jonathan, Voting Committee Members And The ICC Board Of Directors Have Ignored Our Complaints That The SRU Is A Hijack Of The Standard, And That The Draft Is Out Of Compliance With The Title, Scope, Pins Notification In Standard Action, Press Release, And Description On The ICC Website, Instead Of Bringing The Standard Back Into Compliance With The Original Intent Of The Tiny House Standard- To Add The Chassis To Tiny Houses.
- A New Pins Notification As Required By ANSI For Substantive Changes And The Change In Stakeholders Has Been Denied.
- It Is Obvious That The Standard Will Never Be Adopted Into The IRC, Nor Does It Seem To Be The Goal And Is Being Manipulated By ICC To Be Written To Benefit ICC, So The Standard Can Be Bundled With The ICC 1200 Series Standards That Can Be Adopted By The State Or Locally Without Inclusion To The IRC.

### [Long Beach Webinar: Approving Small Residential Dwelling Units](#)

### [March 19, 2025 OSMTH 1215 Meeting Notes](#)

### [April 2, 2025 OSMTH 1215 Meeting Notes](#)

### [My Complaint Regarding The Title Change And Failing To File A New Pins Notification](#)

### **The Hierarchy Of The Committee Is Withholding Information**

It has obviously been determined once again that wheeled structures do not belong in the IRC, because they are not industrialized buildings. A tiny house on wheels is vehicular unit, a motor vehicle that complies with the Federal Motor Vehicle Safety Standards, regulated by NHTSA, and DOT, and NHTSA allows self certification for the manufacturers, so we are back to where we started from 7 years, when the movable provisions in the code that resulted into Appendix Q Tiny Houses were not allowed in the code proposal and were considered a hijack of the proposal, and the proponents were advised to remove them, or the entire proposal would be turned down.

## **Original Definitions In The Draft Of OSMTH 1215**

***SMALL RESIDENTIAL UNIT (SRU).*** A dwelling unit that is 1,200 square feet or less constructed as a permanent residential structure with or without a PERMANENT CHASSIS system.

***TINY HOUSES.*** A SMALL RESIDENTIAL UNIT 400 square feet or less with or without a PERMANENT CHASSIS system.

### **After A Motion The Chassis Was Removed From The Definition Of Tiny Houses**

***03-02-24 – Discussion of definitions for small residential units and tiny house.***

***A motion was brought forth to modify, clarify and affirm the definitions as described below:***

### **Definitions After The Code Proposal Was Submitted**

***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.

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

### ***( Removing The Chassis From The Definition Of Tiny House)***

*The standard is now being manipulated by ICC, to be more compliant with the code proposal that does not include the chassis by the secret hierarchy of the committee.*

According to ICC Consensus Procedures, my complaint should be answered in writing within 30 days.

Thank you for consideration,



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