

June 15, 2025

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Regarding Collective PINS Complaint: OSMTH 1215

The International Code Council (ICC) is developing a tiny house standard by the [OSMTH 1215 Committee and](#) ICC is co-branding the standard with the Tiny Home Industry Association (THIA).

The current title of the standard is called [ICC/THIA 1215 – 202x Design, Construction and Regulation of Tiny Houses for Permanent Occupancy](#).

On May 16, 2025, the ANSI Standards Action Newsletter published a revised PINS notification that the International Code Council (ICC) submitted to add the the Small Residential Unit (SRU) to the title and the scope of the Tiny House standard.

The proposed new title is ICC/THIA 1215-202x, Design, Construction, Inspection and Regulation of **Small Residential Units** and Tiny Houses for Permanent Occupancy.

June 10, 2025 Progress Update Of OSMTH 1215 In Building Safety Journal

The [article](#) omitted **THIA** from the title- ICC 1215 Design, Construction, Inspection and Regulation of Small Residential Units (SRU) and Tiny Houses for Permanent Occupancy and on the [website page](#) it linked to.

Does this mean ICC is not co-branding the standard with THIA anymore? We have not heard.

[May 16, 2025 PINS Announcement: Page 5](#)

The International Code Council (ICC) is not developing the standard in an open consensus process as required by ANSI and federal laws and they have not had a firewall between their

identity as a standard developer, the standards they develop and will profit from, and the profitable services from their subsidiaries.

ICC is exercising their dominant authority, superior strength, and are leveraging the direction of the standard toward their own benefit and agenda with the complete support of the 'Vote Stacked' committee that are complicit in the plan that was discussed behind closed doors, including THIA trade association meetings with competitors that created the strategy with ICC of the Small Residential Unit.

The Small Residential Unit Is The Agenda Of ICC And THIA

The Small Residential Unit (SRU) is the agenda of both ICC and THIA and ICC is taking advantage of their position as a standard developer to create and maintain a monopoly on the tiny house market, compounded with the strategic move of placing tiny houses, an IRC codified term, as a subcategory under a non enforceable made up term called the Small Residential Unit.

Adding the Small Residential Unit to the title and scope, after the occurrence of 20 meetings, is a back tracking move to be in compliance with ANSI, which is too late, because the noncompliance is well documented.

The Small Residential Unit Is A Substantive Change

The ICC announcement in ANSI Standards Action failed to put out a Call For Comment For Substantive Changes and create an additional document that links and lists the Substantive Changes. The Small Residential Unit is a substantive change, along with every single time it was listed in text, along with the SRU acronym.

Additional Substantive Changes

- The Small Residential Unit Is The Primary Focus Of The Standard, Tiny Houses Are A Subcategory Of The SRU And Incidental To The Standard.
- The Chassis Has Been Removed From The Definition Of The Tiny House Definition. The Non Compliant First Draft That Went Out For Public Comment Included The Chassis.

The Small Residential Unit Is The 'IRC Superior Equivalent' To A Manufactured Home

The Small Residential Unit is the 'IRC superior equivalent' to a manufactured home, but with the compliance under the ICC umbrella.

I honestly feel that the goal of the Small Residential Unit is to replace manufactured homes.

It is not a bad idea, except it does not belong in a tiny house standard. Manufactured homes still face old unfair stigmas of trailer parks, and Modular homes do not have that stigma. It would only be deemed superior, because of the unfair stigma.

At this time, there is legislation to remove the mandatory requirement for a permanent chassis on a manufactured home and there are new allowances for duplexes, and triplexes for a HUD manufactured home, and there is a lot of marketing of HUD labeled homes that are marketed as tiny homes or a line of small cottages.

Manufactured Homes Will Have An Edge Over Modular Homes

When the requirement of the permanent chassis is removed from the manufactured home, there will be massive competition occur between manufactured homes and modular homes, because manufactured homes preempt building codes, so they will have an edge over Modular Homes, and this is why I feel ICC wants to stay ahead of this, and create the Small Residential Unit that could include duplexes, and triplexes, as a competitive housing type to manufactured homes to keep the regulatory compliance under ICC. This would also mean less auditing from IBTS.

At almost every OSMTH 1215 meeting, one of the committee members keeps bringing up how there could be two or three tiny houses on one chassis.

They keep giving this as a reason to use the term Small Residential Unit. This is obviously a duplex or a triplex.

This was also brought up in all the work group meetings and in a group email. Nick Mosley describes the Small Residential Unit in an email.

[Nick Mosley's Email.](#)

Neither the draft or the definition of the SRU include the duplex or triplex housing type. The SRU definition implies that it is one unit.

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.

I am certainly not opposed to a duplex or a triplex, but we need to crawl before we walk, and we have not successfully achieved the first step of achieving recognition of tiny houses on wheels as a viable solution with chassis provisions in the code.

The Small Residential Unit Is Hijacking The Tiny House Standard.

The proponents of the SRU keep declaring that we should NOT use the term Tiny House in a 'tiny house standard.'

The OSMC committee developed the ICC/MBI 1200 and 1205 in **22 meetings** which was a pretty heavy lift because it was two standards.

In contrast, the OSMTH 1215 committee just had their **21st meeting**, and the status is they are still approving public comments on the initial first draft, and we are still arguing about the SRU.

The primary goal of the standard was to fill in the gaps for tiny houses, and further the progress of Appendix Q Tiny Houses, now titled Appendix BB Tiny Houses in the 2024 IRC, and add chassis provisions to Tiny Houses.

The goal was for the standard to be referenced in the 2027 IRC, but that no longer seems to be the goal.

ICC has more control of their desired outcome with standards, in comparison to code development and that seems to be the goal, so the standard could be adopted without the inclusion of the IRC, written to implement their agenda.

The Small Residential Unit duplex and triplex is obviously a part of the future plans for the SRU.

The Standard Needs To Eliminate The Term Small Residential Unit From The Standard Entirely.

It is an opportune time for the proponents of the Small Residential Unit, who do not want to use the term tiny house to work with current code proposals in the IRC for 2027 including the proposal to expand the scope of the International Residential Code to include triplex and quadplex "missing middle" housing.

Complaint # One: Violations Of ANSI PINS Requirements

- January 31, 2024 First Meeting OSMTH 1215: ICC failed to submit a new revised PINS when the standard changed to the Small Residential Unit as the primary focus, which occurred right at the beginning of the public calls and work groups.
- Sept 2024: ICC denied and ignored Janet Thome's repeated requests for a new PINS that started in Sept. 2024.
- ICC ignored complaints that the standard was out of compliance with the approved title, scope, working group scopes, and primary intent of the standard, and need for the tiny house industry.
- October 15, 2024: ICC published an initial draft of the standard that included the primary takeover of the Small Residential Unit, and did not follow the required step to publish a new PINS with listed substantive changes and a revised PINS, so the current draft that

went out for public comment was out of compliance with ANSI requirements and ICC Consensus Procedures.

- October 22, 2024: ICC Long Beach Expo featured the draft of the standard and had a Webinar on approving Small Residential Units, including tiny homes and ADUs.
- December 19, 2024: David Tompos Sr. misled the committee regarding the disapproval of ICC/MBI 1200 and 1205 for the inclusion of the 2024 IBC and blamed it on the term Tiny House which was not accurate to justify the need to use the term Small Residential Unit. Nick Mosley also stated the same reason. They were both on the OSMC Committee.
- Jan.10, 2025: The vice chair of OSMTH 1215 submitted a code proposal (RB42-25) that referenced the 1215 standard by the January deadline. The ICC Code Development ignored my complaints that the standard was not in compliance with the criteria for referenced standards.
- March 19, 2025: A Motion To Remove TheTerm Chassis From The Definition Of Tiny Houses, should have been sent to the entire consensus committee for a vote, and listed in ANSI Standards Action, because it was a substantive change. The initial draft of the standard that went out for public comment included the chassis in the definition.
- The May 16, 2025 revised PINS failed to publish a Call For Comments on the Substantive changes and list them, identify adequate stakeholders, including on-site and owner builders, or give a reason in the Project Need section why the Small Residential Unit was needed to be added to the standard, or alert the tiny house industry that it would be in a primary position over Tiny Houses, and Tiny Houses would become a subcategory under the Small Residential Unit.
- April 2, 2025: Meeting Notes falsely stated a comment about title changes and ANSI. 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.
Incorrect- ANSI does not address titles. A New PINS is required if there are substantive changes or if stakeholders have changed. The meeting notes stated-This scope and purpose do seem to be in conflict with the title.
- April 29, 2025: CAH # 1. Joshua Harmon asked for disapproval of RB42-25 that referenced OSMTH 1215. There were many opponents that spoke up against the SRU.
- May 15, 2025: They approved the April 2, 2025 meeting notes. I objected because it was not accurate regarding a change in the title. The next day the new PINS was published, Karl did not even mention it.
- June 4, 2025: At the open meeting, Janet Thome asked Karl Aittaniemi, the ICC Director of Standards why they filed the new PINS. He answered that the stakeholders had changed and the standard did not just include tiny house builders. The new PINS changed the verbiage to: **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. The April 2023 stated- **Stakeholders: Tiny house builders**, building code officials, building product manufacturers, architects, engineers.

- June 10, 2025. ICC published a progress update of the OSMTH 1215 standard in Building Safety Journal with the new title change without an explanation. It linked to a new website for the committee and they had a short statement regarding the PINS.
- [June 11, 2025 Janet Thome complaint.](#)
- [June 12, 2025 Janet Thome requested a new PINS.](#)

[April 2, 2025 Complaint](#)

Proposed New Title: ICC/THIA 1215-202x, Design, Construction, Inspection and Regulation of **Small Residential Units** and **Tiny Houses** for Permanent Occupancy.

Stakeholder Section From PINS: Builders Including Tiny House Builders

The strategic move to place the Small Residential Unit in front of Tiny Houses in the title and using the verbiage, **'including tiny house builders'** in the stakeholders category is once again documenting that Tiny Houses are no longer the focus, in contrast that the initial PINS clearly placed Tiny Houses as the one and only focus.

No- The Tiny House Industry does not want Tiny Houses to be **'included,'** Tiny Houses should be front and center, the primary focus of the standard which was approved by the ICC Board Of Directors.

No- The Tiny House industry does not want Tiny Houses, a codified term in the IRC to be a subcategory under the Small Residential Unit, a made up term that is not enforceable, or even used by building officials, architects, engineers, consumers, etc.....

How Will A Small Scale Artisan Tiny House Builder Compete With A Large Scale Small Residential Unit Manufacturer?

They cannot compete on price. They will be squeezed out.

I just looked at the financial report of a large manufacturer that builds Manufactured Homes, Modular, and Park Models that would be included in the new PINS updated Stakeholders category. Some are marketed as tiny homes. They have an umbrella name, and they are the parent company of many other manufacturers.

In the last few years, they invested over \$ 100 million in acquisitions, over \$100 million in expansion for their plants, over \$ 300 million to their shareholders, with over \$ 300 million left in cash. They also own subsidiaries for mortgages and insurance.

ICC Is Assisting The Corporate Takeover Of Tiny Houses In Favor Of Their Own Big Industry Clients Of Their Subsidiaries Through A Standard Development That Was Intended To Progress The Tiny House Industry, But Instead ICC Is Leading The Way For Small Artisan Tiny House Builders To Be Swallowed Up By Big Industry.

Submitting a new PINS and putting out the Call For Call For Substantive Changes is the responsibility of the standard developer, and an interested party should not have to request it repeatedly and have the request be ignored by the CEO, Director Of Standards, and ICC Board Of Directors.

Complaint # Two: Violation Of WTO Coherence: Not To Duplicate

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.

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.

[See Exhibit One: ICC Due Diligence](#)

ANSI Violations

Complaint # Three: Violation Of ANSI : 1.3.1.1 Criteria for approval

e) other known national standards were examined with regard to harmonization and duplication of content and if duplication exists, there is a compelling need for the standard;

- ICC was given a year of due process by ASTM, and we overcame all false duplication claims, and then ICC decided to duplicate the ASTM Tiny House standards in progress, without giving a compelling need for the standard.
- ICC published a disingenuous press release stating they joined the ASTM subcommittee, to make sure there was not an overlay. *It is a complete overlay.*

Complaint # Four: Violation Of ANSI: Lack Of Dominance

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 being dominated by ICC, THIA, and David Tompos Sr.
- The standard is being dominated by an overabundance of manufacturers.
- ICC has refused to address our complaints about domination.

Complaint # Five: Violation Of ANSI: Balance Of Interests

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.

Complaint # Six: Violation Of ANSI Considerations Of Views And Objections.

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.

Complaint # Seven: Normative American National Standards Policies

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 by a circulated document and objections in the meetings.
- ICC has falsely classified their voluntary standards as **'requirements.'**

Complaint # 8 Violation Of Appeals Process

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 Janet Thome the right to appeal and have stated they also will not answer any more complaints. They never answered my complaints so nothing really changed.
- The new PINS should reset the ability for Janet Thome to appeal.

[Letter From ICC Attorney To Janet Thome](#)

[Response From Janet Thome Regarding The Letter](#)

Complaint # 9 Violation Of ANSI Consideration Of Views And ICC Consensus Procedures

1.6 Consideration 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.

ICC refuses to answer 99% of comments, requests to be added to an agenda of a meeting, and written complaints in violation of both ANSI requirements and ICC Consensus Procedures that are required to be answered in writing within 30 days.

Complaint # 10 Complaint Regarding David Tompos Sr.: There Are Now 3 Officials 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. He is violating the Sherman Act and the Code Of Ethics.

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, a for profit subsidiary of ICC, he is a voting committee member of OSMTH 1215 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.

ICCNTA's services include, testing, inspection, and certification for building product manufacturers, services for off-site construction that include design review, and evaluation of modular and panelized systems for code compliance, and HUD services that include plan review and inspection services.

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.

[G102- CAH Disapproval Video](#)

[G102-PCH Disapproval Video](#)

David Tompos Sr. created a group boycott of ASTM E541 not only in the public calls, work group meetings, his written comments, and circulated a memo to the entire committee and myself, and openly disparaged ASTM E541, in favor of ICC's own proprietary material, ICC/MBI 1205 which ICC, and ICC's subsidiaries will benefit from. The memo was sent outside of the meetings to persuade the entire committee to be opposed to including ASTM E541 in the standard.

[David Tompos Sr. Memo](#)

Note: Currently as the committee is going through the public comments, they are removing all referencing of ICC/MBI 1205 and they are not going to reference ASTM E541 either, however they still succeeded not to support a competitive standard, and they will just bundle this standard with the other 1200 series. Including ICC/MBI 1205 for certification, which is creating an illegal tying agreement to the standard, and excluded ASTM E541 from the market. ASTM E541 is referenced in over 10 states, and is the personnel requirements for third parties that certify manufacturers.

Pacific West Associates (PWA) Meets The Criteria Of ASTM E541

Alex Ontiveros, is a voting member of OSMTH 1215 committee, and his company is called Pacific West Tiny Homes, it is a subsidiary of Pacific West Tiny Homes. PWA is a third party agency that meets the criteria of ASTM E541. Alex did not stand up for the criteria his company falls under.

He just got in line with what David Tompos Sr. wanted. PWA certifies every single manufacturer on the committee.

ICC has a plan to replace ASTM E541 with ICC/MBI 1205 and the OSMTH 1215 committee have now created Market Exclusion Of ASTM E541 to reduce competition which is a violation of the Sherman Act.

Alex Ontiveros, and David Tompos Sr. are two competitive third parties that were both on the board of THIA, and they all collectively agreed with the voting members to create both a horizontal and agreement to restrict trade, by not allowing ASTM E541 as a referenced standard in 1215.



" While we did incorporate 1200 & 1205, which include different accreditation requirements, the ASTM E541 accreditation is still listed in our state regulations, and where there are differing requirements between the regulations and incorporated standards, the regulations supersede, so the ASTM E541 accreditation is still acceptable in Virginia. "

ASTME541 And The State Of Virginia

ASTME541 Supercedes Adopted Standards *Where There Are Differing Requirements*

After the adoption of the standards in Virginia, I reached out to Jeff Brown, who is the State Building Codes Office Director because I wanted to know if they were still accepting third party agencies that met the criteria of ASTME541 and this was his answer.

*" While we did incorporate 1200 & 1205, which include different accreditation requirements, the ASTM E541 accreditation is still listed in our state regulations, and where there are differing requirements between the regulations and incorporated standards, the regulations supersede, so the ASTM **E541** accreditation is still acceptable in Virginia. "*

Sincerely,

JEFF BROWN, MCP, CBO, CFM
State Building Codes Office Director
Virginia Department of Housing and Community Development (DHCD)

[Source](#)

Antitrust Violations

Complaint # 11 Violation Of CP#50-21 – Antitrust Compliance Guidelines; Joint Activity

1.0 Purpose of Council Policy: ICC brings together numerous government officials and industry members to participate in the code and standard development process. These Guidelines provide basic guidance on the antitrust laws that may be applicable to these and other activities sponsored by ICC and/or any ICC subsidiary (“ICC Activities”).

2.0 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.

ICC has created an illegal joint venture with THIA for the purpose of restricting trade, and controlling the tiny house market both through the financial benefit of both ICC and THIA, and to eliminate competition and create a barrier to entry for monopoly control.

- ICC and THIA jointly fought the ASTM Tiny House committee with false claims of duplication and inaccurate information including the fact that they stated it could not be a code, it had to be a standard, in contradiction to ICC developing a standard. ICC paid staff member, David Tompos Sr. was on the board of THIA, and helped create the strategy on behalf of ICC to disrupt the ASTM committee.
- ICC exclusively co-published model legislation, co-publications, and is co-branding the standard with THIA.

Complaint # 12 Violation Antitrust Laws By Stacking The Vote With THIA Board Members And Close Associates To Manipulate And Control The Outcome And Usher In The Small Residential Unit Agenda.

- ICC is co-branding the standard with THIA, even after proven documentation that they jointly disrupted the ASTM Tiny House committee.
- ICC stacked the vote with THIA board members and close associates for the intent for ICC to monopolize the tiny house industry and reduce competition.

- ICC carefully selected building officials who would also vote in the direction they planned behind closed doors with THIA.
- The committee has shown very little independence of mind and everything is deferred to David Tompos Sr.
- ICC has allowed David Tompos Sr. to create a hostile environment and he has bullied interested parties. There are now 3 formal complaints regarding his bullying behavior.
- The '**consensus**' that they will submit to ANSI was not achieved by the tiny house industry, it was achieved by ICC's careful selection of voting members that created a not so hidden agenda, including THIA trade association meetings with competitors that agreed to support ICC proprietary standards and practices, and boycott a competitive standard. David Tompos Sr. was on the board of THIA for almost 5 years and he was on the THIA board when the strategy of the standard was created and the committee has constantly deferred most decisions to him.
- ANSI requires that the committee is made of a diverse group, but ICC has violated this process and turned down key industry stakeholders that applied to be on the committee, but were denied in favor of the stacked committee to fulfill the not so hidden agenda, formulated beyond closed doors.
- It is inappropriate that the voting committee, especially the THIA board members that are supposed to be representing the best interests of the tiny house industry are trying to eliminate the tiny house term from the tiny house standard. They have stated that building officials see tiny houses on wheels as recreational vehicles, and called the tiny house term 'inflammatory', or that there is a stigma around the term, and that it is associated with homeless shelters, and they have spoken about eliminating Appendix BB Tiny Houses in future code cycles. Instead of focusing on the misconceptions surrounding tiny houses, and taking this opportunity to clear up the misconceptions, they are choosing to throw the tiny house industry into more chaos, which will add more to the misconceptions with the complete takeover of the tiny house standard with the Small Residential Unit.
- Building officials on the committee have stated that some building officials might not even adopt the chassis provisions. That is the primary focus of the standard which has become lost.
- Macy Miller and other interested parties fought for over 6 months in the work groups to have the term chassis added to the definition of a tiny house, which was then removed at the March 19, 2025 meeting, the same meeting Karl stated that ICC staff was considering adding the Small Residential Unit to the title of the standard because of '**confusion**'. ***We Are Not Confused. We Have Been Witnessing The Manipulation Of The Standard By The Standard Developer And The Trade Association They Partnered With And The Complicant Building Officials.***

March 19, 2025 Meeting Notes Except

"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 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.*

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 clear in the current proposed definitions. Should a tiny house 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. ”

Note: The only reason the title is in conflict with the scope and purpose of the standard, is because ICC allowed the standard to be hijacked by the Small Residential Unit, without following both ICC Consensus Procedures and ANSI requirements, so the draft is not in compliance with ANSI requirements.

The seemingly landslide vote is a deception and was the result of the stacked committee. Soon after a well known architect that was one of the two votes, resigned because she felt her vote did not matter and her participation was useless.

ICC Executives Have Held Tiny Houses Captive

Tiny Houses have been held captive by the executives of ICC for over 6 years for their desired outcome that benefits ICC and their services. [Appendix Q Tiny Houses](#), that was adopted into the 2018 IRC, originally had provisions for movable structures, but the head of the ICC code approval process said that he would not accept the proposal as written because he believed it was what they call in the industry a “hijack” of the original proposal.

Originally when [ICC/MBI 1200 and 1205](#) were developed, tiny homes were excluded, then included, but after the 2024 IBC hearing, when the standards were turned down, they removed all the terms relating to tiny houses from the committee description, scope of the standards, and the body of the standards, with the ‘notion’ that tiny homes were inclusive, and there was no need to call them out.

Note: G102-21 Was The Code Proposal That Referenced The ICC/MBI 1200 And 1205 Standards.

G102- CAH Disapproval Video

G102-PCH Disapproval Video

The OSMTH 1215 Committee Members Need To Be Disbanded And The ICC Co-Branding With THIA Needs To Be Eliminated Along With The Exclusive Joint ICC/THIA Publications, To The Exclusion Of Other Representatives Of The Tiny House Industry To be in compliance with ANSI and federal laws in a standard development.

Complaint # 13 CP#50-21: Refusing To Deal

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.

Complaint # 14 Violation Of 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.

Complaint # 15 Violation Of ICC Consensus Procedures: The Project Team

We have continuously asked who Project Team is besides Karl, and no one answers us. The Project Team failed to monitor attendance, conflicts of interest, or objections.

Complaint # 16 Violation Of 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. They also ignore most agenda requests to be added to the public calls.

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

Complaint # 17 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
- The building officials colluded with ICC and made sure ASTM E541, a competitive standard, was not only not given a fair and open discussion, and it was not allowed to be listed as an alternative to ICC/MBI 1205.

Note: Currently as the committee is going through the public comments, they are removing all referencing of ICC/MBI 1205 and they are not going to reference ASTM E541 either, however they still succeeded not to support a competitive standard, and they will just bundle this standard with the other 1200 series. Including ICC/MBI 1205 for certification, which is creating an illegal tying agreement to the standard, and excluded ASTM E541 from the market. ASTM E541 is referenced in over 10 states, and is the personnel requirements for third parties that certify manufacturers.

Pacific West Associates (PWA) Meets The Criteria Of ASTM E541

Alex Ontiveros, is a voting member of OSMTH 1215 committee, and his company is called Pacific West Tiny Homes, it is a subsidiary of Pacific West Tiny Homes. PWA meets the criteria of ASTM E541. Alex did not stand up for the criteria his company falls under. He just got in line with what David Tompos Sr. wanted. PWA certifies every single manufacturer on the committee. Alex is a board member of THIA.

Any new cost that a third party will incur will be passed on to the manufacturer, and then to housing.

The OSMTH 1215 created a Market Exclusion Of ASTM E541 and this is an antitrust violation of the Sherman Act and assisted ICC to create a barrier to entry for third parties, to give more market control to ICC and their subsidiaries for monopoly power. This lessens competition and creates a barrier to entry.

The Sherman Act makes it illegal to monopolize, conspire to monopolize, or attempt to monopolize a market for products or services.

Complaint # 18 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.

[April 29, 2025 Complaint](#)

The Small Residential Unit Term Is A Description, Not A Housing Type

The OSMTH 1215 is trying to create a new housing type called the Small Residential Unit which is not appropriate and will add unnecessary confusion in the housing marketplace, because the term is more of a description that is associated most frequently with accessory dwelling units (ADUs) and it could be a description of a tiny home.

From The State Of Washington: What Is An Accessory Dwelling Unit?

An accessory dwelling unit (ADU) is a **small, self-contained residential unit** located on the same lot as an existing single-family home.

[Source](#)

American Planning Association

An accessory dwelling unit (ADU) is a **smaller, independent residential dwelling unit** located on the same lot as a stand-alone (i.e., detached) single-family home. ADUs go by many different names throughout the U.S., including accessory apartments, secondary suites, and granny flats. ADUs can be converted portions of existing homes (i.e., internal ADUs), additions to new or existing homes (i.e., attached ADUs), or new stand-alone accessory structures or converted portions of existing stand-alone accessory structures (i.e., detached ADUs).

[Source](#)

ICC Is Trying To Control Not Only The Tiny House Market, But The ADU Market October 22, 2024 ICC Expo Webinar.

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](#)

[My Complaint To AIA Regarding The Webinar](#)

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

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

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 And Remove The Co-branding of The Standard With 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,

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 Owner Builder
[Author Of Trailblazing Tiny: A Guide To Breaking Free](#)

Andrew Pleban Vice President
 Tiny House Alliance USA
[Owner American Tiny House](#)

Attached Is Also 407 Signatures From A [Change.Org](#) Petition That Are Opposed To the Small Residential Unit