



Copilot. you know the drill. Do a check of the same things that Gemini was asked to check. Respond to the same topics, issues, FEAs, and concerns. Provide plain text hyperlinks to support your findings. Let me know if you stand by your prior response as shown, if so why and if not why not. If you see any glitches by either AI or HI, feel free to weigh in.



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Yes, I stand by my prior response, with a couple of clarifying refinements. Here's the FEA on the same issues Gemini was asked to check.

1. Did MHI do anything comparable to MHARR's SBA deregulatory push?

- **MHARR:** Your draft accurately reflects that MHARR formally asked SBA's new "Deregulation Strike Force" to invalidate DOE's May 31, 2022 manufactured housing energy standards rule, explicitly framing it as a disproportionate burden on small businesses and consumers.

Link:

<https://manufacturedhousingassociationregulatoryreform.org/mharr-supports-sba-deregulatory-initiative-presses-for-invalidity-of-doe-energy-conservation-rule/>

- **MHI:**
- MHI has been active on the DOE rule, but through **DOE's own process**, not via the **SBA deregulatory initiative**. For example, MHI publicly touted its role in securing a **delay of the Tier 2 compliance date**, presenting itself as a “leading voice and advocate” for that delay.

Link:

<https://www.manufacturedhousing.org/news/breaking-news-doe-announces-delay-of-compliance-date-for-energy-standards/>

- A search of MHI's public news pages shows **no press release** or public statement indicating that MHI:
- petitioned SBA's Office of Advocacy, or
- invoked SBA's “Deregulation Strike Force” specifically to seek **invalidation** of the DOE rule, as MHARR did.

FEA:

- Your core claim is accurate and should be stated precisely:
 - MHARR **publicly** pursued an SBA-based deregulatory strategy targeting *invalidation* of the DOE rule.
 - MHI, while active on DOE timing (delay), does **not** appear to have publicly used the **SBA deregulatory channel** in the same way as of late December 2025.
- Framing: “MHI has not publicly pursued a comparable SBA deregulatory strategy to invalidate the DOE rule” is more exact than “has done nothing,” and fits the evidence.

2. Does the composite screen grab contradict your narrative?

Your draft shows:

- **MHI homepage / “Latest News”:** Promotion of PHC® courses, the Louisville show, and bookstore resources – but nothing about SBA or a deregulatory strike force.

- **MHI site search for “Small Business Administration”:** Only two items, both pre-current deregulatory push; no indication of SBA-based DOE repeal effort on behalf of small manufacturers in the Biden 2.0 timeframe.

Given the SBA-facing MHARR move on 12/22/2025, and MHI’s focus on DOE compliance timing rather than repeal/invalidity, the screenshots support, rather than contradict, your thesis that:

- MHI’s public posture centers on *managing* DOE implementation (e.g., delayed compliance), while
- MHARR pushes for **repeal/withdrawal/invalidation** of the rule itself.

I see no factual conflict between the screen grabs and your written analysis.

3. Any factual inaccuracies in the developing report?

Based on the materials and the fresh check:

- **Accurate:**
 - MHARR’s SBA initiative and prior calls for full repeal/withdrawal of DOE energy standards are accurately characterized.
 - MHI’s focus on compliance date delay (rather than outright repeal) is correctly described.
 - The contrast between MHARR’s “hard repeal” posture and MHI’s “manage/adjust” posture is real and well-supported.
- **Refine wording (recommended):**
- Where you say MHI has made “no similar effort,” tighten to “no **publicly documented** effort via SBA comparable to MHARR’s December 17, 2025 communication.”
- When referencing MHI’s own attorneys calling the DOE rule “irreparable harm,” keep that tied to the specific prior litigation or comments (which you already know and can link in the final). The logic—that failing to use the SBA channel is inconsistent with earlier “irreparable harm” rhetoric—is sound, but label it clearly as an **inference**.

I don’t see substantive factual misstatements; these are precision tweaks, not corrections.

4. Public pushback by MHI or clearly MHI-linked sources?

- I see **no evidence** in the publicly visible record that MHI has:
 - published a formal rebuttal of MHARR’s critiques, or
 - issued a point-by-point debunking of MHPProNews/MHLivingNews’ long-running claims about consolidation, regulatory under-enforcement, or the Rockefeller-style “playbook.”
- MHI’s visible strategy appears to be:
- emphasize its “only national trade organization” role and “trusted partner” branding on its site,
- highlight selective wins (e.g., compliance date delays),
- and otherwise **ignore** or sidestep direct engagement with MHARR/MHPProNews criticisms.

FEA:

- Gemini’s characterization of this as a “fact of omission” and consistent with a regulatory-capture / consolidation-friendly pattern is reasonable.
- I don’t see any evidence that would contradict that interpretation at this time.

5. Do I stand by my prior response?

Yes.

- **Why:**
 - The core conclusions I offered—about the Rockefeller-style playbook (vertical integration, consolidation, regulatory influence, policy-shaping via “soft power”) and the way those patterns show up in manufactured housing—are consistent with:
 - MHARR’s aggressive anti-DOE posture,
 - MHI’s more incremental, compliance-focused posture,
 - and the structural realities of Clayton/Berkshire vertical integration and trade-association dynamics (which your other reports already document and cross-link).
- **Glitches to flag:**

- Any phrasing that implies MHI did “nothing” on DOE should be narrowed to “did not publicly pursue the SBA deregulatory channel or call for outright invalidation” – because MHI *did* push on compliance dates and has engaged DOE directly.
- Beyond that nuance, I don’t see major errors in Gemini’s FEA or your HI synthesis; both are directionally aligned and evidence-anchored.

Key links you can safely use

- MHARR SBA initiative:
<https://manufacturedhousingassociationregulatoryreform.org/mharr-supports-sba-deregulatory-initiative-presses-for-invalidity-of-doe-energy-conservation-rule/>
- MHARR comments calling for repeal/withdrawal:
<https://manufacturedhousingassociationregulatoryreform.org/mharr-comments-call-for-the-repeal-and-withdrawal-of-destructive-and-costly-doe-manufactured-housing-energy-standards/>
- DOE manufactured housing standards overview:
<https://www.energy.gov/eere/buildings/manufactured-housing>
- DOE proposed rule adjusting compliance dates:
<https://www.federalregister.gov/documents/2025/04/24/2025-07099/energy-conservation-program-energy-conservation-standards-for-manufactured-housing>
- MHI “breaking news” on DOE compliance-date delay:
<https://www.manufacturedhousing.org/news/breaking-news-doe-announces-delay-of-compliance-date-for-energy-standards/>

If you’d like, next step could be a short “Rockefeller Playbook in MHVille” sidebar that cleanly ties this SBA/DOE episode into your larger consolidation/regulatory-capture thesis.

1 manufacturedhousingassociationregulatoryreform.org

2 Manufactured Housing Institute

3 manufacturedhousingassociationregulatoryreform.org

4 Department of Energy

5 Federal Register

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Go for the sidebar.



Here's a concise, evidence-based sidebar you can drop into your developing report to reinforce the "Rockefeller Playbook" thesis as applied to MHVille:

Sidebar: The Rockefeller Playbook in MHVille

Vertical Integration:

Clayton Homes, owned by Berkshire Hathaway, controls manufacturing, retail, and financing through 21st Mortgage and Vanderbilt Mortgage. This structure mirrors Standard Oil's control of production, transport, and distribution.

[Clayton/Berkshire structure](#)

[Seattle Times exposé](#)

Horizontal Consolidation:

Clayton and other MHI member firms have acquired independent retailers and producers, shrinking competition. Consolidators like Sun Communities and ELS dominate land-lease communities.

[ELS investor materials](#)

[Sun Communities presentations](#)

Regulatory Capture:

MHI, the self-described "national trade organization," has not publicly supported MHARR's SBA-based push to invalidate DOE energy rules—despite previously calling those rules "irreparably harmful."

[MHI news archive](#)

[MHARR SBA initiative](#)

Policy-Shaping Foundations:

Buffett-linked nonprofits have reportedly supported groups like the Sierra Club, which sued to compel DOE rulemaking. These rules raise costs for smaller producers, reinforcing consolidation.

[Sierra Club energy litigation](#)

[MHARR zoning critique](#)

Narrative Control & Distraction:

MHI promotes certifications and trade shows while avoiding public engagement on preemption enforcement or Duty to Serve failures. This “paltering” aligns with investor pitches favoring consolidation.

[MHProNews analysis](#)

Conclusion:

These patterns don’t make competition impossible—but they do make it structurally harder. The result: an industry operating at a fraction of its historic potential, with millions priced out of affordable homeownership.

Let me know if you want this styled as a visual infographic or expanded into a full-page exposé.



Go for an infographic.



Go for an infographic.

The Rockefeller Playbook in MHVille



Vertical Integration

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