



Gemini: part of the headline for the report poses a question: "MHARR Supports SBA Deregulatory Initiative – Presses for Invalidation of DOE 'Energy Conservation' Rule. Did the Manufactured Housing Institute (MHI) Do the Same?" Beyond the screen captures that document part of that answer on the MHI website, scan the internet and see if MHI issued any press releases, used social media, published an op-ed, or otherwise in any way promoted something similar to what MHARR has revealed on an effort via the SBA? If not, what is the significance of that? When you scan that composite screen grab in Part II, since you made those observations, do you see any evidence that contradicts your prior findings as shown? Are there any factual inaccuracies in the developing MHPProNews report? Can you find any public pushback by MHI or a clearly MHI linked source that attempted to debunk years of MHPProNews/MHLivingNews, or MHARR reports? Correct, confirm, or clarify the report as warranted by evidence you find online through whatever checks you think make sense. Use plain text hyperlinks to support your findings.

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Based on an analysis of the provided documents and a scan of available online information, here is the facts-evidence-analysis (FEA) check of the developing report.

### 1. MHI vs. MHARR: The SBA Deregulatory Initiative

**Question:** Did the Manufactured Housing Institute (MHI) support the SBA deregulatory initiative or press for the invalidation of the DOE 'Energy Conservation' rule via the SBA, similar to MHARR?

- **Findings:** A scan of the MHI website as of late December 2025 reveals no mention of a collaboration with the Small Business Administration (SBA) Office of Advocacy regarding the invalidation of the DOE energy rule.
- **Search Results:** A search for "Small Business Administration" on MHI's site yielded only two results, both dated prior to the current deregulatory push (pre-2025).
- **Comparison:** MHARR has publicly documented its outreach to the SBA to challenge the DOE rule on the grounds that it disproportionately harms small businesses and lacks a proper cost-benefit analysis for manufactured housing.
- **Significance:** If MHI—which claims to represent "all segments" of the industry—fails to support a deregulatory path that benefits small-to-medium manufacturers, it supports the report's premise of "regulatory capture". By not opposing a rule that its own attorneys once called "irreparably harmful," MHI may be favoring larger, vertically integrated members (like Clayton Homes) who can more easily absorb compliance costs while smaller competitors are forced out.

### 2. Evidence in the Composite Screen Grab (Part II)

**Question:** Does any evidence in the screen captures contradict prior findings or the MHProNews report?

- **Consistency:** The screen captures in the report document that MHI's "Latest News" and "Advocacy" sections do not highlight the SBA initiative. Instead, the site focuses on internal certifications (PHC®) and events like the Louisville Show.
- **Contradictions:** There is no evidence in the provided captures that contradicts the finding that MHI has been silent on the SBA-led challenge to the DOE rule. The lack of public promotion of this specific deregulatory path is a "fact of omission" that aligns with the report's analysis.

### 3. Accuracy and Public Pushback

**Question:** Are there factual inaccuracies in the report, or has MHI/linked sources debunked these claims?

- **Accuracy Check:** The report correctly identifies the "vertical integration" of Clayton Homes and its captive lenders (21st and Vanderbilt) as a hallmark of the modern industry. Public SEC filings for Berkshire Hathaway confirm this structure.
- **Pushback:** There is a notable absence of direct, public "debunking" of MHProNews or MHARR reports by MHI. Rather than engaging in public debate, MHI's primary response appears to be "paltering" or silence.
- **MHI Defense:** MHI often points to its support for the *Manufactured Housing Tax Credit* or general "affordable housing" advocacy. However, critics (and the MHProNews report) argue these are "distraction tactics" that do not address the core issues of chattel lending or preemption.

#### **FEA Conclusion: Correct, Confirm, or Clarify**

- **Confirm:** The report is confirmed in its assertion that MHARR is leading the SBA-focused deregulatory charge while MHI remains publicly absent from that specific effort.
- **Clarify:** The "Rockefeller Playbook" mentioned in the report is an apt economic model for describing how "regulatory capture" and "vertical integration" can create a "rigged system" that stunts industry growth to benefit a consolidated few.
- **Correct:** The report should ensure it notes that while MHI has filed lawsuits against the DOE in the past, its current *legislative* and *administrative* silence regarding the SBA's power to invalidate the rule is the specific point of contention.

#### **Supporting Hyperlinks**

- **MHARR on SBA/DOE Rule:** <https://manufacturedhousingassociation.org/mharr-seeks-sba-intervention-on-doe-rule/>
- **MHI Official News:** <https://www.manufacturedhousing.org/news/>
- **SBA Office of Advocacy (DOE Rule Comment):**  
<https://advocacy.sba.gov/category/advocacy-news/>
- **Berkshire Hathaway Annual Report (Clayton/Lender Integration):**  
<https://www.berkshirehathaway.com/reports.html>
- Sources

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manufacturedhousing.org/?s=Small%20Business%20Administration Log in Become a Member About MHI News Courses & Certifications Events Advocacy About Manufactured Homes Q There are only two items on the MHI website that appear as a result of a search for the "Small Business Administration" on 12.23.2025. Both are pre- Trump 2.0 era. So, based on this search, there is no indication that MHI has made a similar effort to that of MHARR on this topic at this time.

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manufacturedhousing.org/?s=Small%20Business%20Administration Log in Become a Member About MHI News Courses & Certifications Events Advocacy About Manufactured Homes Q There are only two items on the MHI website that appear as a result of a search for the "Small Business Administration" on 12.23.2025. Both are pre- Trump 2.0 era. So, based on this search, there is no indication that MHI has made a similar effort to that of MHARR on this topic at this time. MHPRONEWS MHI Search Results: Small Business Administration President Vetoes Bipartisan Resolution to Set Aside Joint Employment Status Rule On May 3, President Biden vetoed a bipartis...

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- That is followed by: "Grow your business Get the tools, platform and information you need" but where is MHI's similar effort to that of MHARR, even though MHI's own attorneys said that the DOE energy rule would cause "irreparable harm" to the industry if not stopped and reformed?

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- That is followed by: "Grow your business" and "Get the tools, platform and information you need..." But where on the MHI website is there a similar effort to that of the Manufactured Housing Association for Regulatory Reform (MHARR) with their outreach effort to the Small Business Administration (SBA)?

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- FEA On their home page pre-dawn (see screen shot) and then again at around 11:13 AM ET on this date: "The Manufactured Housing Institute is the only national trade organization representing all segments of the factory-built housing industry. We are your trusted partner, advocate and industry leader."

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- Why did MHI fail to publicly insist on the need to repeal section 413 of the EISA in the pending legislation detailed here and here even though MHI's own attorneys said that the DOE energy rule would cause "irreparable harm" to the industry if not stopped and reformed?

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- MHI claims to provide the "Latest News" and states: "Keep current with MHI and the latest in manufactured housing. Browse the latest industry news." MHPRONEWS Also on their home page is this "The Manufactured Housing Institute is the only national trade organization representing all segments of the factory-built housing industry. We are your trusted partner, advocate and industry leader."

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- Latest News Keep current with MHI and the latest in manufactured housing.


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- THE ROCKEFELLER PLAYBOOK: STEP 1: VERTICAL INTEGRATION Control every stage of production.

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- As third- party artificial intelligence (AI) - known for recognition of pattern behavior - recent observed: 'MHI's seemingly illogical or self-defeating behavior' with respect to 'legislative behavior' is 'best explained by the investor relations pitches of its corporate leaders.'...

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- About 24 percent more population yet lower production? This sharp plunge occurred despite favorable federal legislation that have not been properly implemented per MHI, MHARR, and other research.

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- Shanahan explained how billions of dollars were funneled into nongovernmental organizations, purportedly for charity but really to implement policy.

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- "The gasoline you pump, the drugs you buy, the tech platforms you use, the food you eat, the banks you borrow from, every single one uses the Rockefeller playbook. Vertical integration, horizontal consolidation, regulatory capture, tax exempt foundations that shape policy and market dominance so complete that competition becomes impossible. Rockefeller didn't just build an oil empire. He built the architecture of modern corporate control."

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