



Hesu Song <hsong@democracyforward.org>

Fwd: 1:25-cv-02020 Production

3 messages

Amy Vickery <avickery@democracyforward.org>
To: Hesu Song <hsong@democracyforward.org>
Cc: Daniel McGrath <dmcgrath@democracyforward.org>

Wed, Apr 15, 2026 at 5:15 PM

Hi Hesu,

Latest AI production from HUD. Do you mind logging?

Amy


----- Forwarded message -----

From: **Amy Vickery** <avickery@democracyforward.org>
Date: Wed, Apr 15, 2026 at 5:15 PM
Subject: Re: 1:25-cv-02020 Production
To: Nikoo, Shahrzad <Shahrzad.Nikoo@hud.gov>
Cc: Daniel McGrath <dmcgrath@democracyforward.org>, Brown, Allison (USADC) <Allison.Brown2@usdoj.gov>

Received; thank you very much!

On Wed, Apr 15, 2026 at 5:14 PM Nikoo, Shahrzad <Shahrzad.Nikoo@hud.gov> wrote:

Hello,

Here is the third production in *Democracy Forward v. HUD, et al.*, 1:25-cv-02020:  [Production 04152026](#) Please let me know if you have any trouble accessing this folder.

HUD had reviewed 2500+ documents for this production, and found 431 responsive. 391 were fully withheld under FOIA exemptions and 40 are produced here. I will follow up later with a privilege log, though it may take us several weeks just because of the volume.

There are a little over 2500 documents remaining that need to be reviewed, so I expect there to be 2 more productions. I will let you know if that prediction changes.

Best,

Shari

Shari Nikoo

Trial Attorney

U.S. Department of Housing & Urban Development

Office of General Counsel

Office of Litigation

202-402-8112

The information in this communication may be confidential and privileged, is intended only for the use of the recipient(s) named above and may be subject to additional legal non-disclosure requirements. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please re-send it to the sender and delete the original message and any copy of it from your computer system.

Hesu Song <hsong@democracyforward.org>
To: Amy Vickery <avickery@democracyforward.org>
Cc: Daniel McGrath <dmcgrath@democracyforward.org>

Wed, Apr 15, 2026 at 6:54 PM

I tried logging in through the Sharepoint link, but I can't (probably because my email address is not a designated recipient).

I think we have to coordinate me typing in your email address and you sending me the code.

[Quoted text hidden]

Amy Vickery <avickery@democracyforward.org>
To: Hesu Song <hsong@democracyforward.org>
Cc: Daniel McGrath <dmcgrath@democracyforward.org>

Thu, Apr 16, 2026 at 1:08 PM

Thanks, Hesu! I'll be at my computer all afternoon drafting the Homan brief, so feel free to use my email credentials whenever today to download and we can coordinate!

[Quoted text hidden]

SweetREX Deregulation AI Decision Tool: REVIEWER GUIDE

- 1) Regulatory Analysis Tab - all work is done on this tab, the others are for perspective
- 2) The focus of the Decision Tool is on deletions – major revisions, replacements, and additions should be made in the NPRM/DFR docs
- 3) Only make changes in the yellow cells – edits or changes in other cells will not be captured by the system, and will not be translated into the NPRM/DFR drafts
- 4) If your change is different than examples provided – explain your change in one of the yellow cells as you would to a co-worker, and the LLM will include it

STRUCTURE:

- 1) Every row in the spreadsheet is a section
- 2) The spreadsheet can be focused on priority regulations by sorting the Parts column

STEP 1: Response to ‘Statutorily Required’

Statutorily Required?	Statutorily Required Explanation	Response to 'Statutorily Required'	Explanation (if you disagree)
NO	No specific provision explicitly mandating or implicitly necessitating this general compliance statement (§ 993.48) was found within the provided	<p>AGREE = DELETE</p> <p>DISAGREE = KEEP</p>	This explanation will be used in the drafting of the NPRM/DFR
		AGREE DISAGREE EXCLUDE	

Statutorily Required?	Statutorily Required Explanation	Response to 'Statutorily Required'	Explanation (if you disagree)
YES	Rulemaking is strictly implicitly necessary. The statutory provisions 7 U.S.C. § 608c(6)(B) (authorizing limitations on the	<p>AGREE = KEEP</p> <p>DISAGREE = DELETE</p>	This explanation will be used in the drafting of the NPRM/DFR
		AGREE DISAGREE EXCLUDE	

For sections that are being deleted, skip STEP 2

STEP 2: Response for Partial Eliminations/Subclauses: (only for sections that are being kept)

AA	AB	AC	AD
Highlighted Partial Eliminations	Additional Elimination	Elimination Reversal	Partial Elimination Explanation
<p>§ 1435.316 Penalties and assessments.</p> <p>(a) [Any sugar beet or sugarcane processor who knowingly markets sugar or sugar products in excess of the processor's allocation will be liable to CCC for a civil penalty in an amount equal to 3 times the U.S. market value, at the time the violation was committed, of that quantity of sugar involved in the violation.]</p> <p>(b) [CCC may assess liquidated damages, as specified in a surplus allocation survey and agreement, with respect to a surplus allocation still existing after the end of a crop year if the processor had a surplus allocation because the processor provided incomplete or erroneous information to CCC.]</p> <p>(c) Under § 359f(c)(5) of the Agricultural Adjustment Act of 1938, as amended, any producer of sugarcane whose farm has a proportionate share, and who knowingly harvests or allows to be harvested an acreage of sugarcane for sugar or seed in excess of the farm's proportionate share shall pay to CCC a civil penalty in an amount equal to 1.5 times the U.S. market value of the</p>	<p>IF YOU HAVE AN ADDITIONAL CLAUSE TO DELETE:</p> <p>1) ENTER NUMBER AND/OR 2) ENTER TEXT TO BE ELIMINATED</p>	<p>TO KEEP A CLAUSE THAT IS SLATED FOR DELETION:</p> <p>1) ENTER NUMBER AND/OR 2) ENTER TEXT TO BE KEPT</p>	<p>These are a "note to self" to retain a record.</p> <p>UNLESS YOU HAVE ADDED A CLAUSE TO DELETE: Add a brief explanation about the DELETION here starting with the number.</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p style="text-align: center;">Separate multiple clauses with a comma this way: §110.5(b), §110.5(c): [specific text]</p> </div>

Step 3: Tracking (for department organization use only, the AI app does not refer to these)

AE	AF	AG	AH
DFR/IFR/NPRM Recommendation (more than one if reviewers have different)	Emails for Policy Reviewer and for Legal Reviewer	Policy Group / Policy Review Complete?	Legal Review Complete?
<p>The reviewer can suggest which rule making document structure to follow</p>	<p>Just to keep track of who made the changes and comments</p>	<p>YES or NO This is only here as a space for reviewers to keep track of what is complete</p>	<p>YES or NO This is only here as a space for reviewers to keep track of what is complete</p>

Step 4: Minor Revisions (Substantive revisions and additions should be made to the NPRM/DFR)

AI	AJ
Subclauses for Minor Revision(s)	Minor Revision(s) - Addition of Wording
<p>ENTER CLAUSE NUMBER(S)</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>Separate multiple clause numbers with commas</p> </div>	<p>DESCRIBE WHERE YOU WANT THE NEW WORDING, FOR EXAMPLE:</p> <p>Immediately after this sentence, "SENTENCE TEXT", please insert the following text, "TEXT TO BE INSERTED"</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>Use commas & clause numbers for multiple revisions: §110.5(c): [text] , §110.5(e): [text]</p> </div>

De-Regulation AI Benefits



- All research on relevant statutory requirements for regulations is completed at the section level
- All you do is review the spreadsheet with recommendations, then edit or comment
- You are in full control of which regulations stay or go
- Revisions can be added easily

- The software program takes all your comments, edits, and revisions, and drafts the documents
- Just review and edit
- Cross check by referring to the spreadsheet for thoroughness if needed
- Basic economic impact will be included (in a month or so we'll have complex economic impact)

- The software can analyze hundreds of thousands of comments in a few minutes
- The results are presented in argument groupings for your review
- You select which arguments you believe should be in the Final Rule

- All you do is edit, revise as needed, and submit

De-Regulation AI Workflows



POLICY TEAM – Review spreadsheet sections and comment on what to keep or revise

The spreadsheet has recommended which sections or partial sections to delete (See instruction doc for this phase)

Policy and Legal can easily review each section for alignment, and review the recommendation with program leaders

Important to put the spreadsheet on a shared drive so all contributors' comments are in one place



LEGAL TEAM – Submit spreadsheet for automated Redline, DFR, and NPRM

Legal Teams can review spreadsheet before submitting, or edit the regulation redline and the automated DFR/NPRM

When ready, upload the spreadsheet to regulation.gov and you'll get the redline, a DFR, & NPRM

We are providing both NPRM and DFR at the same time as incremental effort is minimal; these will require attorney edits



LEGAL TEAM – Submit final DFRs and NPRMs to OIRA

Legal edits the DFRs and NPRMs, and shares with Policy Teams for final comments before submission to OIRA.



LEGAL TEAM / POLICY TEAM – Request comment analysis and confirm relevant arguments

When the comment period is over, the Legal Team requests the comment analysis on regulations.gov and provides the date range.

Comment analysis will appear on a tab next to comments tab on regulations.gov, and the user will receive an email with a link when it is complete.

The Legal Team reviews the arguments, does any additional like groupings, then selects the arguments for the final rule

If/when new argument groupings are made, the app will update the analysis with new summaries of arguments



LEGAL TEAM – Request Final Rule draft, edit Final Rule, and Submit to Regulations.gov

When the comment argument selections are made, the user selects to have the Final Rule created. And provides their email

Within a few minutes the final rule will be emailed to the user.

With the Final Rule draft, the final submission can be made.

The deregulation goal is to eliminate any regulatory provisions that may represent potential overreach or impose unnecessary burdens beyond what Congress has legislated. The spreadsheet you have received represents the system's thorough analysis conducted on the regulatory sections relevant to your program group's operations; this analysis has identified specific sections/clauses for complete or partial elimination based on established criteria.

The process for program groups:

1. We start with the position that the proposed regulatory eliminations are the default case. If you disagree with all or part of an elimination, please note it and your rationale in the columns provided in the spreadsheet
2. Please flag any additional regulatory eliminations that we have not identified, also providing the recommended action and rationale in the spreadsheet columns. This includes regulations tied to defunct programs, outdated requirements, or provisions that impede efficiency without providing significant value.
3. We will then review your suggested changes with you, and at times, with one or more attorneys when they are available.

The spreadsheet is structured so that each row corresponds to a specific regulatory section that has been analyzed. Please provide your review comments and suggestions in the yellow columns, which are described below—you may adjust the width of the columns as you see fit to accommodate the length of your responses. The spreadsheet starts with full regulation elimination suggestions, and as you move across, you'll see the partial regulation elimination suggestions. We advise that you approach the review in that same order, addressing the feedback columns in the order they are presented. If multiple individuals are commenting on the same section analysis, please ensure that you **change the font color** of your response to differentiate between the reviewers. An analysis with sample comments has been provided in a separate tab.

1. **Statutorily Required Column:** Review the finding (YES or NO) for the regulatory section (row) being reviewed. Based on this analysis, choose your response in the Policy Group Response to 'Statutorily Required' column and follow the instructions below.
 - a. If the analysis indicates **Statutorily Required = 'YES'**, you have two options:
 - i. If you agree that the section is required, select **AGREE**. Then, proceed with evaluating whether or not any potential partial eliminations are possible within the section.
 - ii. Alternatively, if you disagree and find the section not to be statutorily required (i.e., recommend eliminating the entire section) or disagree with the necessity of the core subject matter of the regulatory section for another reason, despite the system's 'YES' finding, select **DISAGREE**. Then provide a justification in the 'Statutorily Required Explanation' column. After this, no further review of this section is needed beyond completing the Legal Recommendation and Agency POC columns.
 - b. If the analysis indicates **Statutorily Required = 'NO'**, you also have two options:
 - i. If you agree with the finding and agree that the section can be eliminated, select **AGREE**. This confirms the recommendation for elimination, and no further

review of this section is needed beyond completing the Legal Recommendation and Agency POC columns.

ii. If you disagree with the 'NO' finding and find the section to be statutorily required in some capacity or necessary for another reason (i.e., recommend keeping the section), select **DISAGREE** and then proceed with the analysis to evaluate whether any partial eliminations are possible. Provide your justification for its necessity in the “Policy Group response to Statutorily Required” column and proceed to evaluate potential partial eliminations within the section.

c. Lastly, select **EXCLUDE** if you wish to exclude this section from the regulatory elimination process entirely for a reason which might include, but is not limited to:

- i. The elimination is already being addressed in a separate NPRM process,
- ii. The section was established through negotiated rulemaking and cannot be directly eliminated via this initiative,
- iii. Or when other unique procedural constraints apply. (Provide rationale in the “Policy Group Explanation” feedback column.)

2. Explanation for Statutorily Required Response:

b. If you recommend keeping any regulatory section despite the analysis indicating it lacks a statutory basis, please provide rationale (approx. 3-4 sentences), ideally explaining why the core subject matter of the regulatory section is essential for core mission functions, statutory obligations, or program integrity. If you recommend eliminating any regulatory section, due to either a lack of statutory basis or another reason, despite the analysis to keep it, please provide a concise (approx. one sentence) rationale for the elimination. In the event that you agree with the proposed recommendation but disagree with the provided rationale, please explain how your reasoning deviates from the provided explanation.

3. Additional Elimination Column: If applicable, list the specific additional subclause number(s) or specific text segments you recommend eliminating (e.g., §110.5(c), §110.5(d)). To eliminate only part of a clause, use the format: §110.5(b): ["specific text to eliminate"] or simply indicate the text if the section is organized by clause. Please format your response as a comma-separated list.

4. Elimination Reversal Column: If applicable, list the subclause number(s) or specific text segments (identified in the original analysis's "Non Compliant..." fields) that you recommend keeping despite the proposal to eliminate them. Use the same format as the “Additional Elimination” column (e.g., §110.5(b), §110.5(c): ["specific text flagged but should be kept"]). Please format your response as a comma-separated list. Then append a justification for the reversal in the subsequent “Explanation” feedback column.

5. Partial Elimination Explanation Column:

a. If you recommend keeping any regulatory subclause despite the analysis to eliminate it, please provide an explanation (approx. 3-4 sentences) on why the section/clause/text is essential for core mission functions, statutory obligations, or program integrity.

- b. If you recommend eliminating any subclause despite the analysis to keep it, please provide a concise (approx. 1 sentence) rationale for the elimination.
 - c. In the event that you agree with the proposed recommendation but disagree with the provided rationale, please explain how your reasoning deviates from the provided explanation.
6. **DFR/IFR/NPRM Recommendation Column:** Please recommend for the reviewing lawyers whether a Direct Final Rule (DFR), Interim Final Rule (IFR), or Notice of Proposed Rulemaking (NPRM) is the most appropriate.
 - a. **NPRM:** choose an NPRM if the elimination might be controversial, impactful, or needs public feedback.
 - b. **DFR:** Choose this option for regulatory eliminations or changes that are expected to be non-controversial and routine. This expedited process is appropriate for minor technical corrections, removal of clearly obsolete provisions, or actions where significant adverse public comment is highly unlikely.
 - c. **IFR:** This IFR is akin to an expedited version of the DFR. Choose this option when immediate regulatory changes are necessary—typically to address urgent needs or emergencies—allowing the rule to take effect upon publication while still soliciting public comment afterward.
7. **Emails for Policy Reviewer and for Legal Reviewer:** Provide the email address of the designated employee responsible for this feedback and any follow-up questions regarding this specific section's review. If there are multiple reviewers, please separate their emails by a blank line, making sure to change the font color of each email to match the color of the review in order to differentiate them.
8. **Policy Group / Policy Review Complete?:** Mark 'YES' once the Policy Group leads sign off on the decision for this regulatory section. As a last resort, if the policy group determines that a full or partial elimination is not feasible and the primary path to reduce regulatory burden is a substantive rewrite/revision of the section, mark SUBSTANTIVE REVISIONS NECESSARY here. This also signifies the completion of policy review, flagging the section for a different follow-up process. If any subsequent reviewer has a conflict with a recommendation made by a previous reviewer, please mark 'CONFLICT TO BE RESOLVED' and reach out to the POC listed for that section analysis to finalize a decision for the proposed regulatory action.
9. **Legal Review Complete?:** Mark 'YES' once the program group lead counsel signs off on the decision for this regulatory section. If any subsequent reviewer has a conflict with a recommendation made by a previous reviewer, please mark 'CONFLICT TO BE RESOLVED' and reach out to the POC listed for that section analysis to finalize a decision for the proposed regulatory action.
10. **Subclauses for Minor Revision(s):** In some instances, while agreeing with a proposed partial elimination, you may identify that a minor textual revision to a remaining clause or a closely related provision is necessary to ensure clarity, maintain consistency, or prevent an unintended consequence resulting directly from the elimination. This is distinct from a substantive rewrite

(covered by the "SUBSTANTIVE REVISIONS NECESSARY" option in the 'Policy Group / Policy Review Complete?' column). If your program office believes such a minor, ancillary revision is essential for the successful implementation of an approved elimination, please list the specific clause number(s) in this column (e.g., §110.5(a), §110.7(b)(2)). The revision should directly support and be a consequence of the elimination, rather than introducing new policy or significantly altering the scope of the remaining regulation.

11. **Minor Revision(s) - Addition of Wording:** For each clause number identified in the prior 'Revision(s)' column, please provide a clear and concise description of the desired minor revision in this column. Where possible, provide the exact proposed new text or articulate the specific change (e.g., "Change 'Director' to 'Secretary' in §110.5(a) due to the elimination of §110.6 which defined Director's role," or "In §110.7(b)(2), delete the phrase 'as detailed in section §110.8' because §110.8 is being eliminated.\"). Ensure the suggested revision is minimal and directly addresses the issue created by the accompanying elimination.

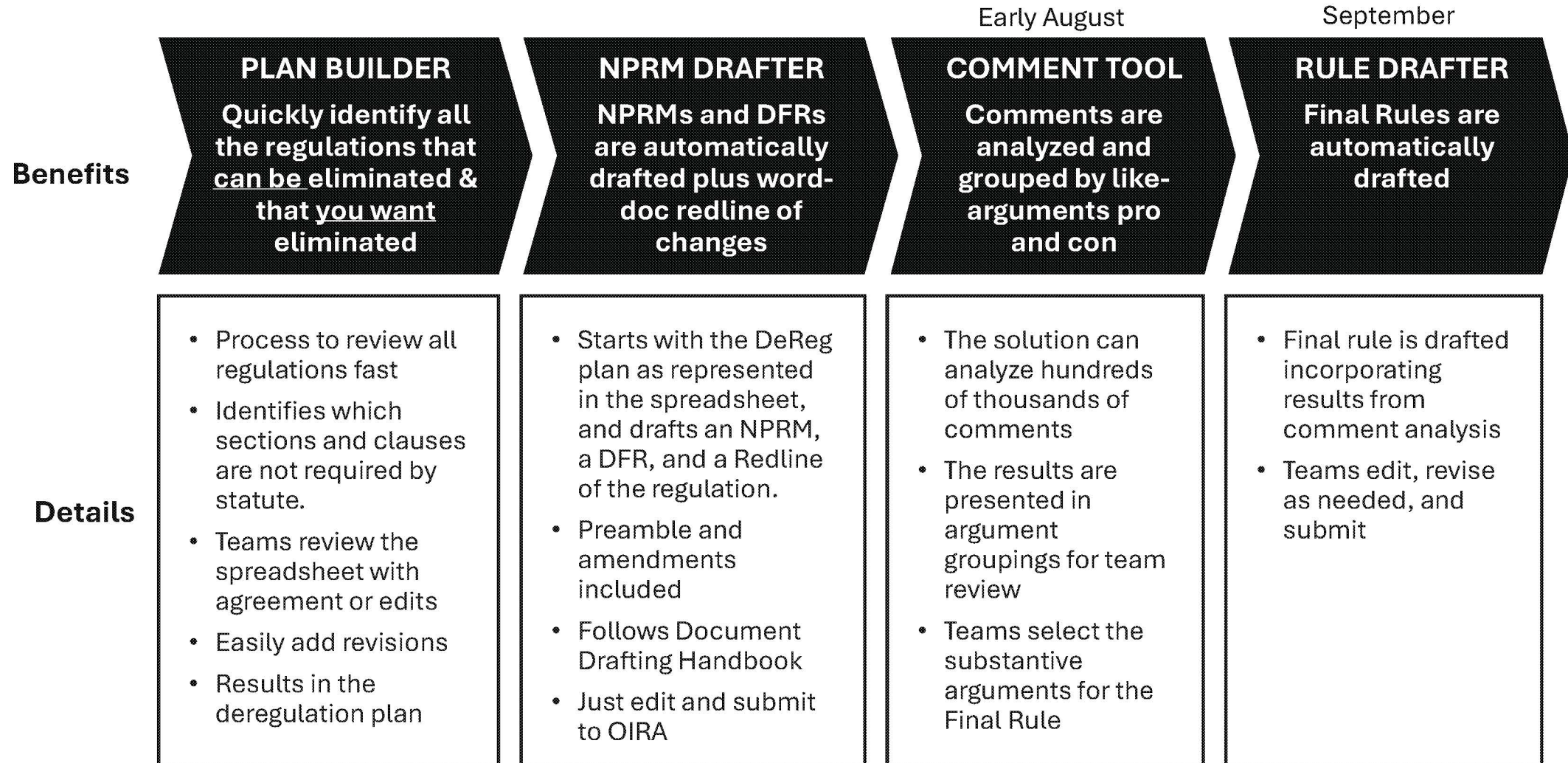
Reference Criteria: For your reference, the following analysis criteria for determining compliance were derived from *The Loper Bright Enterprises v. Raimondo* decision and Executive Order 14219:

- Criterion 1: The regulation lacks a clear basis in the best reading of the underlying statutory authority. It may extend beyond the scope granted by the statute.
- Criterion 2: The regulation raises serious constitutional concerns or potentially exceeds the federal government's vested power.
- Criterion 3: The regulation is based on an unlawful delegation of legislative power, lacking a clear statutory guiding principle. It makes fundamental policy decisions not specified by Congress.
- Criterion 4: The regulation addresses major social, political, or economic issues without clear statutory authorization. This implicates the major questions doctrine.
- Criterion 5: The regulation imposes significant costs on private parties that appear to outweigh public benefits, based on a high-level policy consideration.
- Criterion 6: The regulation harms national interests by unjustifiably impeding areas like innovation or economic development, reflecting a high-level policy judgment.
- Criterion 7: The regulation imposes undue burdens on small businesses or private enterprises, based on a high-level policy consideration.
- Criterion 8: The regulation is redundant, merely restating statutory language without adding substantive clarification or implementation detail.
- Criterion 9: The regulation explicitly uses race-based classifications or treats individuals/groups differently based on race, regardless of intent.

Deregulation AI Solutions

Deregulation AI Apps

Four Apps For The Most Time Consuming Tasks

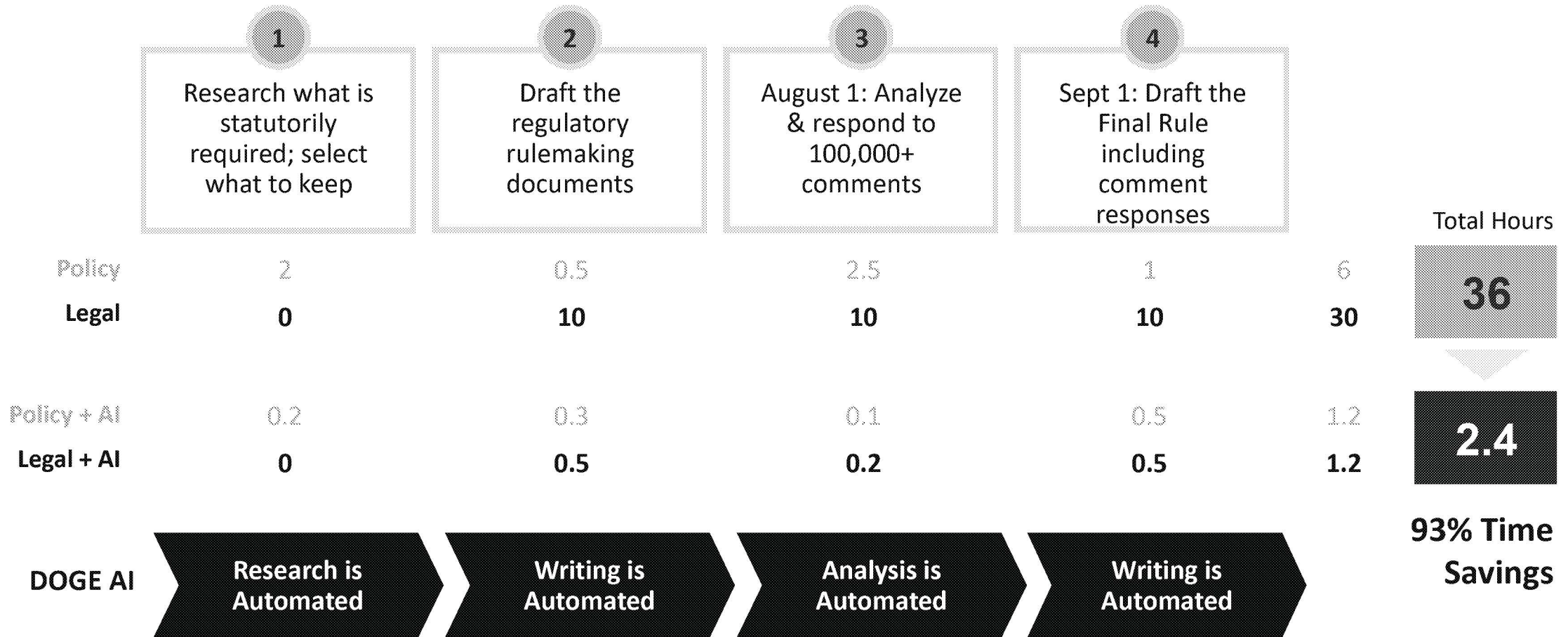


90%+ Time Savings - Agency Policy and Legal Teams Make All The Decisions - Focus on Editing

CAPABILITY

The AI Solutions Increase Output by 15X

De-Regulation Average Hours Required Per Regulatory Section



Agency Policy and Legal Teams Make All The Decisions - Focus on Editing

- 1. The President gave Agencies 60 days to deliver their deregulation delete plan; many departments have not met that timeline - DOGE AI lets you complete the task in a few weeks, and go far beyond, with a full agency review based on statutory requirement and organizational need.**
- 2. DOGE AI ensures each agency can easily meet the 10:1 cut ratio**
- 3. DOGE AI ensures that Agencies will meet the EO requirement that savings from deregulation at minimum offset all costs from new regulations.**
- 4. DOGE AI slashes rulemaking time by 90 %+ , freeing your attorneys and Policy teams for high-value work.**
- 5. DOGE AI evidence-backed flags protect you in court and satisfy OIRA's data needs.**

Enforcing EO 14219 through 8k+ Words of Prompt Engineering

Exemption 5

Defining the Criteria for the AI to go After

- Criterion 1:** The regulation lacks a clear basis in the best reading of the underlying statutory authority. It may extend beyond the scope granted by the statute.
- Criterion 2:** The regulation raises serious constitutional concerns or potentially exceeds the federal government's vested power.
- Criterion 3:** The regulation appears based on an unlawful delegation of legislative power, lacking a clear statutory guiding principle. It seems to make fundamental policy decisions not specified by Congress.
- Criterion 4:** The regulation addresses major social, political, or economic issues without clear statutory authorization. This implicates the major questions doctrine.
- Criterion 5:** The regulation imposes significant costs on private parties that appear to outweigh public benefits, based on a high-level policy consideration.
- Criterion 6:** The regulation harms national interests by unjustifiably impeding areas like innovation or economic development, reflecting a high-level policy judgment.
- Criterion 7:** The regulation imposes undue burdens on small businesses or private enterprise, based on a high-level policy consideration.
- Criterion 8:** The regulation is redundant, merely restating statutory language without adding substantive clarification or implementation detail.
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Establishing a High Threshold for Compliance

Exemption 5

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DEPARTED CONTENT

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PART 7501—SUPPLEMENTAL STANDARDS OF ETHICAL CONDUCT FOR EMPLOYEES OF THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Authority: 5 U.S.C. 301, 7301, 7351, 7353; 5 U.S.C. App. (Ethics in Government Act of 1978); E.O. 12674, 54 FR 15159, 3 CFR, 1989 Comp., p. 215, as modified by E.O. 12731, 56 FR 42547, 3 CFR, 1990 Comp., p. 306; 5 CFR 2635.105, 2635.203(a), 2635.403(a), 2635.603, 2635.607.

Source: 77 FR 46604, Aug. 6, 2012, unless otherwise noted.

§ 7501.101 Purpose.

In accordance with 5 CFR 2635.105, the regulations in this part apply to employees of the Department of Housing and Urban Development (HUD or Department) and supplement the Standards of Ethical Conduct for Employees of the Executive Branch contained in 5 CFR part 2635. Employees are required to comply with 5 CFR part 2635, this part, and any additional rules of conduct that the Department is authorized to issue.

§ 7501.104 Prohibited financial interests.

(a) **General requirement.** This section applies to all HUD employees except special Government employees. Except as provided in paragraph (b) of this section, the employee, or the employee's spouse or minor child, shall not directly or indirectly receive, acquire, or own:

- (1) Federal Housing Administration (FHA) debentures or certificates of claim;
- (2) A financial interest in a project, including any single family dwelling or unit, which is subsidized by the Department, except to the extent such subsidy represents assistance on the employee's principal residence. The definition of "financial interest" is found at 5 CFR 2635.403(c);
- (3)
 - (i) Any Department subsidy provided pursuant to Section 8 of the United States Housing Act of 1937, as amended (42 U.S.C. 1437f), to or on behalf of a tenant of property owned by the employee or the employee's spouse or minor child. However, such subsidy is permitted when:
 - (A) The employee, or the employee's spouse or minor child acquires, without specific intent as through inheritance, a property in which a tenant receiving such a subsidy already resides;
 - (B) The tenant receiving such a subsidy lived in the rental property before the employee worked for the Department;
 - (C) The tenant receiving such a subsidy is a parent, child, grandchild, or sibling of the employee;
 - (D) The employee's, or the employee's spouse or minor child's, rental property has an incumbent tenant who has not previously received such a subsidy and becomes the beneficiary thereof; or

What Information is Fed into the Model

Part Level Authority Documents:

- The part level statutory documents are attached with the analysis of each regulatory section within that part.

Section Level Authority Documents

- Along with the part level authority documents, the specific section level statutory authorities are attached for the analysis of any given section.

Statutory Source

- All statutory text provided to the program for analysis are fetched from uscode.house.gov based on the corresponding references from the [ecfr](http://ecfr.gov).

GUIDE FOR POLICY AND ATTORNEY REVIEW

The deregulation goal is to eliminate any regulatory provisions that may represent potential overreach or impose unnecessary burdens beyond what Congress has legislated. The spreadsheet you have received represents the system's thorough analysis conducted on the regulatory sections relevant to your program group's operations; this analysis has identified specific sections/clauses for complete or partial elimination based on established criteria.

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 - b. If the analysis indicates **Statutorily Required = 'NO'**, you also have two options:

- i. If you agree with the finding and agree that the section can be eliminated, select **AGREE**. This confirms the recommendation for elimination, and no further review of this section is needed beyond completing the Legal Recommendation and Agency POC columns.
 - ii. If you disagree with the 'NO' finding and find the section to be statutorily required in some capacity or necessary for another reason (i.e., recommend keeping the section), select **DISAGREE** and then proceed with the analysis to evaluate whether any partial eliminations are possible. Provide your justification for its necessity in the “Policy Group response to Statutorily Required” column and proceed to evaluate potential partial eliminations within the section.
- c. Lastly, select **EXCLUDE** if you wish to exclude this section from the regulatory elimination process entirely for a reason which might include, but is not limited to:
- i. The elimination is already being addressed in a separate NPRM process,
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- b. If you recommend keeping any regulatory section despite the analysis indicating it lacks a statutory basis, please provide rationale (approx. 3-4 sentences), ideally explaining why the core subject matter of the regulatory section is essential for core mission functions, statutory obligations, or program integrity. If you recommend eliminating any regulatory section, due to either a lack of statutory basis or another reason, despite the analysis to keep it, please provide a concise (approx. one sentence) rationale for the elimination. In the event that you agree with the proposed recommendation but disagree with the provided rationale, please explain how your reasoning deviates from the provided explanation.

3. Additional Elimination Column: If applicable, list the specific additional subclause number(s) or specific text segments you recommend eliminating (e.g., §110.5(c), §110.5(d)). To eliminate only part of a clause, use the format: §110.5(b): ["specific text to eliminate"] or simply indicate the text if the section is organized by clause. Please format your response as a comma-separated list.

4. Elimination Reversal Column: If applicable, list the subclause number(s) or specific text segments (identified in the original analysis's "Non Compliant..." fields) that you recommend keeping despite the proposal to eliminate them. Use the same format as the “Additional Elimination” column (e.g., §110.5(b), §110.5(c): ["specific text flagged but should be kept"]). Please format your response as a comma-separated list. Then append a justification for the reversal in the subsequent “Explanation” feedback column.

5. Partial Elimination Explanation Column:

- a. If you recommend keeping any regulatory subclause despite the analysis to eliminate it, please provide an explanation (approx. 3-4 sentences) on why the section/clause/text is essential for core mission functions, statutory obligations, or program integrity.
 - b. If you recommend eliminating any subclause despite the analysis to keep it, please provide a concise (approx. 1 sentence) rationale for the elimination.
 - c. In the event that you agree with the proposed recommendation but disagree with the provided rationale, please explain how your reasoning deviates from the provided explanation.
6. **DFR/IFR/NPRM Recommendation Column:** Please recommend for the reviewing lawyers whether a Direct Final Rule (DFR), Interim Final Rule (IFR), or Notice of Proposed Rulemaking (NPRM) is the most appropriate.
 - a. **NPRM:** choose an NPRM if the elimination might be controversial, impactful, or needs public feedback.
 - b. **DFR:** Choose this option for regulatory eliminations or changes that are expected to be non-controversial and routine. This expedited process is appropriate for minor technical corrections, removal of clearly obsolete provisions, or actions where significant adverse public comment is highly unlikely.
 - c. **IFR:** This IFR is akin to an expedited version of the DFR. Choose this option when immediate regulatory changes are necessary—typically to address urgent needs or emergencies—allowing the rule to take effect upon publication while still soliciting public comment afterward.
7. **Emails for Policy Reviewer and for Legal Reviewer:** Provide the email address of the designated employee responsible for this feedback and any follow-up questions regarding this specific section's review. If there are multiple reviewers, please separate their emails by a blank line, making sure to change the font color of each email to match the color of the review in order to differentiate them.
8. **Policy Group / Policy Review Complete?:** Mark 'YES' once the Policy Group leads sign off on the decision for this regulatory section. As a last resort, if the policy group determines that a full or partial elimination is not feasible and the primary path to reduce regulatory burden is a substantive rewrite/revision of the section, mark SUBSTANTIVE REVISIONS NECESSARY here. This also signifies the completion of policy review, flagging the section for a different follow-up process. If any subsequent reviewer has a conflict with a recommendation made by a previous reviewer, please mark 'CONFLICT TO BE RESOLVED' and reach out to the POC listed for that section analysis to finalize a decision for the proposed regulatory action.
9. **Legal Review Complete?:** Mark 'YES' once the program group lead counsel signs off on the decision for this regulatory section. If any subsequent reviewer has a conflict with a recommendation made by a previous reviewer, please mark 'CONFLICT TO BE RESOLVED' and reach out to the POC listed for that section analysis to finalize a decision for the proposed regulatory action.

- 10. Subclauses for Minor Revision(s):** In some instances, while agreeing with a proposed partial elimination, you may identify that a minor textual revision to a remaining clause or a closely related provision is necessary to ensure clarity, maintain consistency, or prevent an unintended consequence resulting directly from the elimination. This is distinct from a substantive rewrite (covered by the "SUBSTANTIVE REVISIONS NECESSARY" option in the 'Policy Group / Policy Review Complete?' column). If your program office believes such a minor, ancillary revision is essential for the successful implementation of an approved elimination, please list the specific clause number(s) in this column (e.g., §110.5(a), §110.7(b)(2)). The revision should directly support and be a consequence of the elimination, rather than introducing new policy or significantly altering the scope of the remaining regulation.
- 11. Minor Revision(s) - Addition of Wording:** For each clause number identified in the prior 'Revision(s)' column, please provide a clear and concise description of the desired minor revision in this column. Where possible, provide the exact proposed new text or articulate the specific change (e.g., "Change 'Director' to 'Secretary' in §110.5(a) due to the elimination of §110.6 which defined Director's role," or "In §110.7(b)(2), delete the phrase 'as detailed in section §110.8' because §110.8 is being eliminated."). Ensure the suggested revision is minimal and directly addresses the issue created by the accompanying elimination.

Reference Criteria: For your reference, the following analysis criteria for determining compliance were derived from *The Loper Bright Enterprises v. Raimondo* decision and Executive Order 14219:

- Criterion 1: The regulation lacks a clear basis in the best reading of the underlying statutory authority. It may extend beyond the scope granted by the statute.
- Criterion 2: The regulation raises serious constitutional concerns or potentially exceeds the federal government's vested power.
- Criterion 3: The regulation is based on an unlawful delegation of legislative power, lacking a clear statutory guiding principle. It makes fundamental policy decisions not specified by Congress.
- Criterion 4: The regulation addresses major social, political, or economic issues without clear statutory authorization. This implicates the major questions doctrine.
- Criterion 5: The regulation imposes significant costs on private parties that appear to outweigh public benefits, based on a high-level policy consideration.
- Criterion 6: The regulation harms national interests by unjustifiably impeding areas like innovation or economic development, reflecting a high-level policy judgment.
- Criterion 7: The regulation imposes undue burdens on small businesses or private enterprises, based on a high-level policy consideration.
- Criterion 8: The regulation is redundant, merely restating statutory language without adding substantive clarification or implementation detail.
- Criterion 9: The regulation explicitly uses race-based classifications or treats individuals/groups differently based on race, regardless of intent.

This document is being produced as Native

SWEETREX

AI SOLUTION FOR
REGULATION EXTERMINATION



DOGE

HUD



SWEETREX

AI SOLUTION FOR REGULATION EXTERMINATION

- **A computer software program that leverages AI to automate all the most time-consuming steps in deregulation**
- **Program groups are in control every step of the way, with accelerated review processes, in control of every decision**
- **Legal teams review and edit as needed**

Execution

STEP 1	
SWEETREX AI Action	Analyze all regs for eliminations
Program Group Action	Review each recommendation, update as needed, result is initial delete plan
Legal Team Action	

Execution

	STEP 1	STEP 2
SWEETREX AI Action	Analyze all regs for eliminations	Create word-docs with redlines for readability and context
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Legal Team Action		

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	STEP 1	STEP 2	STEP 3
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Features

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- 3 Includes all department regs/rules
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- 5 Includes cross-cut regulation implications
- 6 Shows the descriptions and rationale for actions
- 7 Conducts regulation analysis
- 8 Conducts long form analysis
- 9 Includes revised section content after the elimination
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	A	B	C	D
1	Deregulation AI Comparison			
2	Features		DOGE ai	Other ai
3	Pulls data from x number of sources		Yes	No
4	Aligns reg/rules with statutes		Yes	No
5	Includes all department regs/rules		Yes	No
6	Creates recommendations for keep, delete, or partial delete		Yes	No
7	Includes cross-cut regulation implications		Yes	No
8	Shows the descriptions and rationale for actions		Yes	No
9	Conducts regulation analysis		Yes	No
10	Conducts long form analysis without crashing		Yes	No
11	Includes revised section content after the elimination		Yes	No
12	Quantifies eliminations through wordcount		Yes	No
13	Identifies most relevant statutory provisions / paragraphs within all of the provided text		Yes	No
14	Provides a summary of the regulatory Section Content		Yes	No
15	Analysis can easily be modified based on need		Yes	No

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8	Legal Team Action			Attorneys review and re-write NPRMs and DFRs, then submit for OIRA	Attorneys craft the final submission documents based on comment inputs and draft	Review notification updates and finalize	

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1														
2				STEP 1		STEP 2		STEP 3		STEP 4		STEP 5		
3														
4		SWEETREX AI Action		Analyze all regs for eliminations		Create word-docs with redlines for readability and context		Create NPRM and DFR templates		Aggregate like-comments and create responses		Analyze prior notifications and create notification updates		
5														
6		Program Group Action		Review each recommendation, update as needed, result is initial delete plan		Review, finalize delete plan, and recommend DFRs vs NPRMs				Review comments and responses, and draft final rule (for all NPRMs and for DFRs with significant comments)		Review notification updates and submits to Legal		
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