From: Amos Manneschmidt
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 12:15:56 AM

To whom it may concern at OGE,
I oppose OGE's proposed legal expense fund regulation as drafted. OGE should:

- Remove the exception that makes compliance with the regulation optional - what good to the public are ethics guidelines in an age when there are so many examples of guidelines being completely ignored?
- Replace the proposed recusal requirement with a broader 5-year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests
- Remove the offensive example involving an accused sexual harasser
- Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Best regards,

Amos Manneschmidt