From: Brian Mann
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 9:48:26 AM

I oppose OGE's proposed legal expense fund regulation as drafted. OGE should:

- remove the exception that makes compliance with the regulation optional;

- 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.

A regulation, by definition, is not "optional". Optional legislation is merely a recommendation or guideline, and the quality of our governance is directly improved by this legislation. It should be a requirement for elected officials.

Thank you,

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Brian Mann
brian.v.mann@gmail.com
612-280-7287 mobile