

Comment from Special Counsel Jeff Lubbers on Regulatory Enforcement Manuals  
December 9, 2022

1. I'm not going to react to Alan's suggestions, many of which I agree with, but before reading his comments, I had the same reaction about the sentence on lines 3-9. It needs to be broken up with numbers.
2. In recommendation 2, I would reorder a few of the paragraphs. I think paragraph d should be moved after g since they cover the same issue, I would also switch paragraphs m and n since settlements seem a better topic to end with.