From: Kirsten Connelly
To: Contact OGE
Cc: Kirsten Connelly
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 2:37:25 PM

To whom it may concern:

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

OGE should:

1-Remove the exception that makes compliance with the regulation optional; this is nonsense and does not solve the problem this legislation is aiming to solve.
2-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;
3-Remove the offensive example involving an accused sexual harasser; AND
4-Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Please ensure this legislation has merit and integrity.

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