From: Skup
To: USOGE
Subject: Fwd: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 2:52:16 PM

Please see comment below.

Begin forwarded message:

> **From:** Skup <skup1537@comcast.net>
> **Date:** June 17, 2022 at 1:31:07 PM CDT
> **To:** ContactOGE@oge.gov
> **Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)**
>
> 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; and
> - place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.
>
> Regards,
> Sandra Kupelian