From: boregush@windstream.net
To: Contact OGE
Subject: "Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 2:04:52 PM

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

* remove the exception that makes compliance with the regulation "optional." The term "optional" is a careless way of leaving the doors unlocked. Be specific.

*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 foe whistleblowers

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