From: Kate Daniel
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Monday, June 20, 2022 11:22:56 PM

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

OGE should:

- Remove the exception that makes compliance with the regulation optional. Compliance with regulations should never be optional.
- Use a broader 5-year recusal requirement to keep donors from making cash gifts to influence policies and regulations that affect them or all 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.

Thank you.

Kate Daniel
118 N Cherokee Trail
Benson, AZ
85602