From: Claudia Sitar
To: USOGE
Subject: Fw: Proposed regulation of legal expense funds
Date: Sunday, June 19, 2022 3:02:38 AM

----- Forwarded Message -----
From: Claudia Sitar <cmsitar@att.net>
To: ContactOGE@oge.gov <contactoge@oge.gov>
Sent: Friday, June 17, 2022, 06:53:21 AM EDT
Subject: Proposed regulation of legal expense funds

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.

Claudia Sitar
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