From: Vickie Echols
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 6:32:11 PM

To whom it may concern:
I oppose OGE's proposed legal expense fund regulation as drafted and submit the following for consideration.
1. REMOVE the exception that makes compliance with the regulation OPTIONAL - I mean come on...what teeth is in all this effort if it is not an expectation that has consequences?
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 harrasser, and
4. PLACE nonprofit (501c3) orgs on an equal footing with large law first by allowing them to hire legal counsel for whistleblowers.

Best regards,
Vickie Echols

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