From: G Gamm
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 6:33:44 PM

I oppose OGE's proposed legal expense fund regulation as drafted. The 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;
Remover 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.
Sincerely,
S. Gamm