From: Kellen Baird
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 6:39:21 PM

I oppose the 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 where they have substantial interests;
- 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,
K. Baird