From: Kathy Gill
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 7:01:09 PM

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

The OGE should:
– provide no exception that would make compliance optional;
– replace the abbreviated recusal requirement with one that is at least five years long;
– remove the offensive example involving accusation of sexual harassment ; and
– place nonprofit charities (501(c)(3) organizations) on an equal footing with law firms by either allowing NPFs to hire legal counsel for whistleblowers or not allowing law firms to provide counsel for officials.

Thank you,
Kathy E. Gill