From: Cathi Brown
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN3209-AA50)
Date: Monday, June 20, 2022 6:10:32 PM

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

- remove the exception that makes compliance with the regulation optionals;
- 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 involvi9ng an accused sexual harasser;
- 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,
Catherine Brown
5206 Great Divide Dr,
Bee Cave, Tx 78738