From: Carol Sulanke
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 7:31:49 PM

To USOGE:

OGE's proposed legal expense fund regulation, as drafted, must be opposed. Instead, OGE should:

1. Remove the exception that makes compliance with the regulation optional;

2. Remove the offensive example involving an accused sexual harasser;

3. Replace the proposed recusal requirement with a broader five-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; and

4. Rlace nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Please oppose adoption of the Rule as currently drafted. Thank you.

Carol Sulanke

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