From: CATHERINE FLAHERTY
To: USOGE
Subject: Fwd: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Saturday, June 18, 2022 12:44:10 PM

See below

Begin forwarded message:

From: CATHERINE FLAHERTY <cmsflaherty@aol.com>
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: June 16, 2022 at 4:54:02 PM EDT
To: ContactOGE@oge.gov

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

- 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 exception that makes compliance with the regulation optional;
- remove 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.

Thank you,

Catherine Flaherty

12329 Melling Lane

Bowie, MD 20715