From: Meredith Pominville
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Saturday, June 18, 2022 12:34:49 PM

To Whom It May Concern:

I oppose OGE's proposed legal expense fund regulation as drafted. ORE 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 or in-kind gifts from influencing decision, policies, or regulations affecting them or the industries in which they have substantial interests;
- 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,

Meredith

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