From: celky@aol.com
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Saturday, June 18, 2022 3:23:42 PM

I am writing you in opposition to OGE's proposed legal expense fund regulation as it is currently drafted.

I believe OGE should:
- remove the exception that makes compliance with the regulation optional;
- replace the proposed recusal requirement with a 5-year recusal requirement to prevent 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 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.

Claudia Kelly
Medina, MN