From: Gayle Cahill
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 10:23:38 PM

I strenuously oppose OGE's proposed legal expense fund regulation as it is drafted.

OGE should:

1: Remove the exception that makes compliance with the regulation optional. If it is *optional*, it has no teeth.

2. Replace the proposed recusal requirement with a broader 5-year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, or regulations that affect them or the industries in which they have substantial interests.

3. Remove the offensive example involving an accused sexual harasser.

4. Place nonprofit organizations (i.e., 501(c)(3) organizations) on an equal footing with large law firms by permitting them to hire legal counsel for whistleblowers.

Thank you.

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