From: Susan Halstead
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 10:16:22 PM

I oppose OGE's proposed Legal Expense Fund Regulations as drafted.
OGE should

- remove the exception that makes compliance to the regulations optional,
- replace the proposed recusal requirement with a broader 5-year recusal requirement that prevents donors of gifts from influencing policy regulations affecting them or their industries of interest,
- remove the offensive example of an accused sexual harasser,
- place non-profit charities (501(c)(3) organizations) on equal footing with law firms, allowing them to hire legal counsel for whistleblowers.

Thank you for listening to citizen comment on this issue before the OGE.
Best Wishes,
Cynthia Susan Halstead
Kentucky