From: Heather Reeves
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 11:53:12 PM

To Whom it May Concern:

While I applaud the intent to strictly regulate legal expense funds, I object to 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 offensive example involving an accused sexual harasser;

- place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers; and, most importantly,

- remove the exception that makes compliance with the regulation optional. Ethics regulations must be mandatory, and non-compliance should result in significant penalties.

Thank you,
Heather Reeves