From: Rebecca Carlson
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulaton (RIN 3209-AA50)
Date: Thursday, June 16, 2022 11:00:23 PM

I am concerned about this proposed regulation. "Optional" regulations will not have any impact. We know from past behavior if there is a loophole the people impacted by the rule will use it.

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

- Remove the offensive example involving a 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 whisleblowers.

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If you have any questions about my submission please advise. Thank you.

Becky

Rebecca Carlson
Madison, Wisconsin