From: Mary Berk
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 10:14:40 PM

Hi there,

Just wanted to share some citizen feedback that I am opposed to OGE's proposed legal expense fund regulation as drafted. A far more responsible rule would do the following:

- Remove the exception that makes compliance with the regulation optional. Compliance should be mandatory.
- 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.

These changes are critical to an even remotely responsible set of rules, and to a functioning democracy.

Thank you,
Mary