From: Catherine Ellenwood
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 4:35:58 PM

I oppose OGE's proposed legal expense fund regulation as drafter. 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 gift from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests
- Remove the offensive example involving accused sexual harasser
- Place non profit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Sincerely,

Catherine Ellenwood