From: Glenn Green
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 4:31:02 PM
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image002.png

I believe the propose Legal Expense Fund Regulation should be modified before it is adopted.

Specifically, I submit that the OGE should:

1. Remove the exception that makes compliance with the regulation optional;

2. 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;

3. place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Sincerely,

/s/ Glenn

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