From: Rona
To: Contact OGE
Subject: Recommendation
Date: Friday, June 17, 2022 8:18:02 PM

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 an accused 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 whistleblowers.

Rona Brandell