From: Pallas Carter
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 10:02:56 PM

Good afternoon,

I'm writing to you today to oppose OGE's proposed legal expense fund regulation as drafted.

I strongly urge the OGE to remove the exception that makes compliance with the regulation optional. Making such regulation optional would allow the rule to be skirted entirely.

Additionally, OGE should:
• 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.

Thank you for your time.
-Pallas Carter