From: patricia gubbins
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 11:45:12 AM

I oppose OGE's proposed legal expense fund regulation as drafted
there should be no exception to make compliance optional
replace proposed recusal requirement with 5 yr recusal requirement
remove example with sexual harrasser
place non-profits on equal footing with large law firms by allowing them to hire counsel for whistleblowers