From: Shannon Kerr
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 10:12:09 AM

I oppose capital 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.