From:	Contact OGE
To:	USOGE
Subject:	FW: Proposed Rule: Legal Expense Fund Regulation (RIN 3209–AA50)
Date:	Thursday, June 16, 2022 2:10:35 PM

From: Rebecca Finley [mailto:finley.ra@gmail.com]
Sent: Thursday, June 16, 2022 2:05 PM
To: Contact OGE <contactoge@oge.gov>
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209–AA50)

To whom it may concern,

I oppose OGE's proposed legal expense fund regulation as drafted. 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. Remove the offensive example involving an accused sexual harasser, as the inclusion of this unnecessary example risks intimidating victims of sexual harassment or assault;

4. 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,

-Rebecca Finley