From: Mary Sherman
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 9:38:06 AM

I oppose OGE's proposed legal expense fund regulation as drafted. OGE should instead:
-Remove the exception that makes compliance with the regulation optional - why on earth would you go through the trouble of drafting a regulation if compliance was 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 interest;
-Remove the offensive example involving an accused sexual harasser, and;
-Place non-profit charities on an equal footing with law firms by allowing them to hire legal counsel for whistleblowers.
Thanks -

Mary Sherman