From: William Keller
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 7:23:47 AM

To whom it may concern -

I oppose the OGE's proposed legal expense fund regulation as drafted. Please do not create an exception that makes compliance option. Please 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 interests.

Also, please place 501(c)(3) nonprofit charities on the same footing as law firms by allowing them to hire legal counsel for whistleblowers.

Thanks,

William Keller