From: Andrea Cabral
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 5:24:37 PM

To the Director of OGE and staff:
Please accept this communication as a public comment on the proposed regulation referenced above.
As a career public servant, former state prosecutor of 16 years, a former county sheriff for 10 years and former state Executive Secretary for Public Safety and Security, I oppose OGE's proposed legal expense fund regulation as drafted.
1. Compliance with the regulation should NOT be optional;
2. The 5-year recusal period should expanded to affirmatively prohibit cash gift donors from influencing policies, regulations or any decision that affects them or an industry in which they have a substantial interest; and
3. 501(c)(3) non-profits should have the same ability as large for-profit law firms to hire legal counsel for whistleblowers.
Thank you.