From: Dan Barry
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 11:17:58 AM

Dear OGE Staff,

as I read about this proposal I thought it was a joke. Or perhaps a rough draft of the next season of Stranger Things where the upside down world comes to life. Upon further reading however I see it is just another twisted corrupt move by God knows who as a lobbyist(s) to further corrupt due process. Enough; it is time for you to put the Trump years behind us, develop transparency, and be a representative government of the people, by the people, and for the people. (Lincoln is rolling in his grave over this kind of abuse). These proposals wreak of the stench that big monied interests have brought. Do something decent and make ethics count. This does the opposite.

I am dismayed at several of the proposed legal expense fund regulations in their current draft form. Let me be even more clear, I am opposed to this draft because of the following provisions and how it must be improved prior to being adopted.

1) Remove the example of involving an accused sexual harasser.
2) Place nonprofit charities (501(c)(3) organizations) on an equal basis with large law firms by allowing them to hire legal counsel for whistleblowers.
3) 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 or the industries in which they have substantial interests.
4) **Remove the exception that makes compliance with the regulation optional.**

Dan Barry
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