From: Rachel Griffin
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 10:36:09 AM

To Whom it May Concern:

I'm writing to declare my opposition to OGE's proposed legal expense fund regulation as drafted.

I strongly believe that OGE should do the following:

- Remove the exception that makes compliance with the regulation 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 interests

- Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

- Remove the offensive example involving an accused sexual harasser

Thank you for your time and attention.

Sincerely,

Rachel Griffin
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