From:	STEVEN KNOTT
To:	Contact OGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Friday, June 17, 2022 10:41:42 AM
Attachments:	image.png FVT9cfNXEAAZdwO.png

Greetings,

Comments in attachment as well if that is convenient for you.

I oppose OGE's proposed legal expense fund regulation as drafted. OGE should:

- 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;
- remove the offensive example involving an accused sexual harasser; and
- place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Your Obedient Servant,
SKnott
Steven Knott
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