From: Sue Moreth Wilson
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 10:23:33 AM

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.**

Sue Wilson