From: Sanchez,Katie
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation
Date: Friday, June 17, 2022 10:54:34 AM

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

1) Remove the exception that makes compliance with the regulation optional;
2) 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;
3) Remove the offensive example involving an accused sexual harasser; and
4) Place non-profit charities (501(c)(3) organizations) on equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Katie Sanchez
Plymouth, MN
763-300-7509

Katie Sanchez
Senior Branch Office Administrator
Edward Jones
5814 Excelsior Blvd
St Louis Park, MN 55416-2830
(952) 926-0931
www.edwardjones.com

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