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| **From:** | Jeffrey Clayton |
| **To:** | Contact OGE |
| **Subject:** | Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50) |
| **Date:** | Thursday, June 16, 2022 3:53:44 PM |

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Dear regulators,

I'm writing to oppose 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;

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

Thank you,

Jeff Clayton