**From:** amber bird
**To:** Contact OGE
**Subject:** Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
**Date:** Thursday, June 16, 2022 3:20:21 PM

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To whom it may concern,

I strongly oppose OGE's proposed legal expense fund regulation as currently drafted. OGE should do *all* of the following:

- Remove the exception that makes compliance with the regulation optional. History tells us that making this optional is likely to be the same as not having a regulation at all.
- 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.
- Place 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,
Amber Bird