**From:** Caroline Cox
**To:** Contact OGE
**Subject:** Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
**Date:** Thursday, June 16, 2022 3:15:37 PM

---

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.

I don't understand the point of optional regulations, so that is the most important part that I think you should change. If it's optional, won't the only people to opt in be people who would obey the guidelines even if they weren't regulations? And wouldn't the people who most need clear rules, those most tempted to skate close to or into unethical behavior, just be able to skip compliance and continue to be tempted?

Caroline Cox
caroline.cox@verizon.net