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| **From:** | Robert Carvalho |
| **To:** | Contact OGE |
| **Subject:** | Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50) |
| **Date:** | Thursday, June 16, 2022 3:21:10 PM |

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I 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 five year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries they are involved in.
3. Place nonprofit charities on an equal footing with law firms by allowing them to hire legal counsel for whistleblowers.

Thank you for working to improve the situation, please continue to tighten these regulations up a bit more.
Robert Carvalho
San Jose, California