**From:** Liana Gioia
**To:** Contact OGE
**Subject:** Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
**Date:** Thursday, June 16, 2022 3:01:46 PM

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I oppose OGE's proposed legal expense fund regulation as drafted. OGE should remove the exception that makes compliance with the regulation optional. It should 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 interest. It should remove the offensivee example involving an accused sexual harasser and it sged place non-profit charities on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Sincerely,

Liana Gioia