**From:** Pallas Carter
**To:** Contact OGE
**Subject:** Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
**Date:** Thursday, June 16, 2022 3:32:01 PM

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Good afternoon,

I'm writing to you today to oppose OGE's proposed legal expense fund regulation as drafted.

I strongly urge the OGE to remove the exception that makes compliance with the regulation optional. Making such regulation optional would allow the rule to be skirted entirely.

Additionally, OGE 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 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.

Thank you for your time.
-Pallas Carter