From: Jennine Carmichael
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 1:28:40 PM

I am writing to register opposition to the proposed legal expense fund regulation as drafted. OGE should strengthen the regulation by:

Removing the exception that makes compliance with the rule optional.

Replacing 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.

Allowing 501(c)(3) organizations to hire legal counsel for whistleblowers, which would place them on equal footing with large law firms.

Finally, OGE should remove the example that involves an accused sexual harasser. It is offensive.