From: Daniel Carlisle
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 12:27:56 PM

To whom it may concern,
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 non-profit charities (501(c)(3) organizations) on an equal footing with large firms by allowing them to hire legal council for whistleblowers.

Making compliance with a regulation "optional" is insulting to anyone who even considers this matter. The fact that supposedly highly trained and educated members of our government would suggest such a thing is preposterous.

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