From: Andrew Thompson
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 1:07:10 PM

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 in the industries in which they have substantial interests; 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.

Andrew J. Thompson, Esq.
Shapero & Roloff Co., L.P.A.
1111 Superior Avenue East, Suite 1310
Cleveland, OH 44114
T: (216) 781-1700
F: (216) 781-1972
athompson@shaperoroloff.com

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