From: Katie Carmien
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 1:30:40 PM

Hello,

I'm writing to express my concerns about the proposed legal expense fund regulation as drafted. I believe it has some loopholes that have grave implications and would allow unethical behavior. Here are the parts I believe would need to be changed:

1) Compliance with the regulation should not be optional. (In that case, what would the point of having the regulation at all be?) It should be *mandatory* to follow this regulation.
2) The recusal requirement should be broader and should forbid donors of cash gifts from influencing decisions, policies, or regulations affecting them or industries in which they have substantial interests.
3) The example with a sexual harasser is offensive and OGE should remove it.
4) 501(c)(3) organizations should also be able to hire legal counsel for whistleblowers.

Thank you for taking the time to read this email.

Best,
Kathleen Carmien