From: Sarah Nicholson
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 1:38:45 PM

Hello, I wanted to provide comment on the proposed rule regulating legal expense funds.

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 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.

Sincerely,
Sarah Nicholson

Sent from my iPhone (please excuse any typos)