From: Anthony Della Grotta
To: Contact OGE
Subject: Re: Proposed rule: legal exfund regulation (RIN3209-AA50)
Date: Thursday, June 16, 2022 12:30:15 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 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

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On Thu, Jun 16, 2022, 11:59 AM Anthony Della Grotta <adgcastle@gmail.com> wrote: