From: Doug
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 9:48:08 AM

I am writing regarding OGE's proposed legal expense fund regulation as drafted. I oppose OGE's proposed legal expense fund regulation as drafted. As it is proposed, it will not effectively eliminate the possible corruption that non-transparent legal expense funds pose.

OGE should: - ABSOLUTELY 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.

These changes would make this regulation more effective in fighting possible corruption in government. Please consider these changes and amend the proposed regulation.

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