From: sean dougherty
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 9:58:12 AM

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.

Let's actually have ethics and a rule of law with teeth in this country.

Thank you, and please do better for the good of us all.

Sean Dougherty