From: Joel
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 9:37:39 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.