From: Larry Herfindal
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 9:44:57 AM

I oppose OGE's proposed legal expense fund regulation as drafted. OGE should:

<!--[if !supportLists]-->1. <!--[endif]-->remove the exception that makes compliance with the regulation optional;

<!--[if !supportLists]-->2. <!--[endif]-->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;

<!--[if !supportLists]-->3. <!--[endif]-->remove the offensive example involving an accused sexual harasser; and

<!--[if !supportLists]-->4. <!--[endif]-->place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Regards,

Larry Herfindal