From: Contact OGE
To: USOGE
Subject: FW: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 2:11:00 PM

From: Bill Asher [mailto:gcnp55@gmail.com]
Sent: Thursday, June 16, 2022 2:03 PM
To: Contact OGE <contactoge@oge.gov>
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)

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

1. remove the exception that makes compliance with the regulation optional;

2. 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;

3. remove the offensive example involving an accused sexual harasser;

and

4. place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Sincerely,

William Asher
Lakewood, Washington
98498