From: Jeremy Brown-Hayes
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 2:37:45 PM

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