From: Ruben Boiardi
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 2:46:32 PM

I oppose OGE's proposed legal expense fund regulation asdrafted. 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.

Sincerely
Ruben Boiardi