From: Contact OGE
To: USOGE
Subject: FW: OGEs legal defense fund
Date: Thursday, June 16, 2022 2:11:20 PM

From: dleicher@dleicher.com [mailto:dleicher@dleicher.com]
Sent: Thursday, June 16, 2022 2:01 PM
To: Contact OGE <contactoge@oge.gov>
Cc: Dleicher <dleicher@dleicher.Com>
Subject: OGEs legal defense fund

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.

Sent from my iPhone