From:	Contact OGE
To:	USOGE
Subject:	FW: Proposed Rule: Legal Expense Fund Regulation (RIN 3209–AA50)
Date:	Thursday, June 16, 2022 2:10:22 PM

From: Paul Sands [mailto:psands858@gmail.com]
Sent: Thursday, June 16, 2022 2:06 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:

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.