From: Martin Dawson
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 2:19:58 PM

I oppose the legal expense fund as proposed by the OGE. It does not go nearly far enough to prevent corruption through the use of legal defense funds.
The OGE should and must make the following changes to this proposal:
-Eliminate the exception that makes compliance with the regulation optional -- the regulation should be mandatory and not up to the judgment of the official who will be motivated to ignore it.
-Expand the recusal requirement to a mandatory 5 years to prevent donors from influencing any decisions or regulations that affect them or the industries in which they have interests.
-Allow 501(c)(3) charities to hire legal representation for whistleblowers, placing them on an equal footing with large law firms.
-The example involving a military officer facing court martial on charges of sexual harassment is potentially offensive and should be replaced with a less fraught example.