From: Michael Lane
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
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I am against the legal expense fund regulation proposed by USOGE in its current draft form. The changes USOGE needs to make are:

1. Strike out the exception that makes compliance with the regulation optional - make compliance mandatory, period. (A look at America's current climate will tell you that making compliance optional will encourage a great many to ignore the regulation altogether and make it essentially useless against corruption.)
2. The proposed recusal requirement is not good enough. Replace it with a 5-year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, and/or regulations affecting them or the industries in which they have interests.
3. Remove the example involving an accused sexual harasser; it does not add any substance to the regulation.
4. Insert language that puts nonprofit charities - 501(c)(3) organizations - on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

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