From: Susan Nedza
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 5:50:06 PM

As a former federal employee (DHHS) and elected official, I oppose the OGE's proposed legal expense fund regulation as drafted

OGE should:
1) Remove the exception that makes compliance with the regulation optional as this guts the regulation;
2) 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;
3) Remove the offensive example involving an accused sexual harasser.

Thank you.