From: RA
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 5:48:59 PM

I have just learned of OGE's proposed regulation for legal expense funds. I oppose OGE's proposed legal fund regulation as drafted. In oder to maintain ethical standards for our government, OGE should:

1) remove the exception that would make compliance with the regulation optional
2) replace the proposed recusal requirement with a broader 5 year recusal requirement. Prevent donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests
3) remove the example involving an accused sexual harasser - it is offensive
4) place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms, by allowing them to hire legal counsel for whistleblowers

Thank you for your consideration of these recommendations.

R Anderson