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

I oppose OGE's proposed legal expense fund regulation as drafted.
IGE should:
remove the exception that makes compliance with the regulation optional

replace the proposed recusal requirement with a broader 5-year recusal requirement that prevent 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 non-profit charities (501 (c) (3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Sincerely
Armando Perez