From: Dave Johnson
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 5:35:52 PM

I oppose OGE's proposed legal expense fund regulation as drafted.

OGE should:

- remove the exception that makes compliance with the regulation optional
- replace the proposed recusal requirement with a broader 5-year recusal requirement
- remove the offensive example involving an accused sexual harasser
- place nonprofit charities on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers

Sincerely,
David Johnson