From: Leila Flumerfelt
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 5:33:48 PM

Dear Sirs and/or Madams:

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 that prevents donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests; and
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- place non-profit charities (501)(c)(3) organizations on an equal footing with large law firms by allowing them to hire legal counsel for whistle-blowers.

Thank you.
Sincerely,
Leila Flumerfelt