From: Sheila Bedell
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 10:08:24 AM

I oppose OGE's proposed legal expense fund regulation as drafted. OGE should do the following:

#1 OGE should remove the exception that makes compliance with the regulation optional.
#2 OGE should replace the proposed recusal requirement with a broader five-year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, or regulations affecting them or industries in which they have substantial interests.
#3 OGE should remove the offensive example involving an accused sexual harasser.
#4 OGE should 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.
Sheila Bedell