From: Howard Brown
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 10:19:02 AM

> I oppose OGE's proposed legal expense fun regulation as drafted.
>
> OGE should:
>
> 1. Remove the exception that makes compliance with the rule optional;
> 2. 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;
> 3. Remove the offensive example involving an accused sexual harasser; and
> 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.
> Sincerely,
> Howard Brown
> Mont Vernon, NH

Sent from my iPad