From: Ellen Koivisto & Gene Thompson
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 1:59:37 PM

Okay, for the record I STRONGLY oppose OGE's proposed legal expense fund regulation *as drafted*. OGE must:

*remove the exception that makes compliance with the reg optional (come on — really?!),
*replace proposed recusal requirement with a broad 5-year recusal requirement to prevent cash gifts donors from influencing decisions, policies, or regs affecting either them or the industries in which they have any kind of substantial interest,
*remove the incredibly offensive example involving an accused sexual harasser,
*and place 501(c)(3)s on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

All of this seems kind of basic to good governance, but we seem to be losing all standards and norms lately, so spelling it out, explicitly, is vital.

Thank you,
Ellen Koivisto