From: Perry Kendall
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 2:58:06 PM

OGE's proposed legal expense fund regulation as drafted is wholly unacceptable. OGE needs to:
Remove the exception permits compliance with the regulation optional;
Replace the proposed recusal requirement with a fully comprehensive 5-year recusal requirement preventing donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests;
Remove the offensive example involving an accused sexual harasser;
Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms and permit them to hire legal counsel for whistleblowers.