From: Deborah Buck
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 2:11:06 PM

I oppose the OGE's proposed legal expense fund regulation as drafted. OGE should:
1) Remove the absurd exception that makes compliance with the regulation optional. Persons who can directly or indirectly benefit from such transactions should not be the determinant of what is appropriate or allowed. This exception gives a free pass for abuse & personal enrichment without accountability;
2) Replace the proposed recusal requirement with a broader 5-year recusal requirement that prevents donors of cash gifts and gifts of value included, but not limited to stocks, cryptocurrency, etc. 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;
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.