From:	Ben Backes
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Tuesday, June 21, 2022 2:07:02 PM

I am writing to express my opposition to OGE's proposed legal expense fund regulation as drafted.

My suggestions to OGE are as follows:

- **Remove** the exception that makes compliance with the regulation optional;
- **Replace** the proposed recusal requirement with a broader and more substantive 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;
- **Remove** the offensive example involving an accused sexual harasser, as "sexual harassment" isn't an ethics issue as much as it is a criminal one, which seems wildly inapprorpriate among other examples describing misuse of funds and bribery; and
- **Designate** nonprofit charities (501(c)(3) organizations) as being on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Regards,
~BcB

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