From: JEREMY CRESSMAN
To: USOGE
Subject: Legal expense fund regulation must be mandatory!
Date: Friday, June 17, 2022 4:34:03 PM

To whom it may concern,

I reviewed the proposed OGE's legal expense fund regulation as drafted. I oppose the current proposal.

OGE should:
- remove the exception that makes compliance with the regulation optional; 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; remove the offensive example involving an accused sexual harasser; and
- place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

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