From: Ronna Weinberg
To: USOGE
Subject: "PROPOSED RULE: LEGAL EXPENSE FUND REGULATION (RIN 3209-AA50)"
Date: Friday, June 17, 2022 5:48:53 PM
Attachments: FVeanf5XwAAMJEb.onq

TO Whom It May Concern:

I oppose OGE's proposed legal expense fund regulation as drafted. 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.