From: Edward Loudon
To: USOGE
Subject: Proposed legal defense fund
Date: Friday, June 17, 2022 5:43:38 PM

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1 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.