From: Susan Robertson
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN) 3209-AA50)
Date: Friday, June 17, 2022 5:35:03 PM

I oppose OGE's proposed legal expense fund regulation as currently drafted. OGE should instead:

-REMOVE the exception that makes compliance with the regulation optional. Optional rules is an oxymoron.
-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 offense example involving an accused sexual harasser - DO BETTER; and
-place non-profit charities (501(c)(3) on an equal footing with large law firms by allowoing them to hire legal counsel for whistleblowers.

Times have changed and these are issues that are being watched carefully and are being monitored by citizens who actually care. Take notice.

Susan E Robertson
A voting citizen
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