From:	Jennifer O"Loughlin
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation RIN 3209-AA50
Date:	Friday, June 17, 2022 4:10:51 PM
Attachments:	DBBDAB00-E1E2-4635-A68C-21F545B66620.png

Hello,

I'm a registered voter in San Francisco, California and read that your making optional a clause on legal expense fund, making it rife for corruption, self-dealing and even more foreign interference in our elections to add to the trash heap of Citizens United.

It is no surprise this concept was created under the Trump Administration, an infected carbuncle on our great nation's history.

I agree with this legal argument (below) and rather than try to paraphrase it badly, I'm pasting it as my formal objection to your proposed rule:

Thank you,

Jennifer O'Loughlin

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.