From: Jumahl
To: USOGE
Subject: Proposed rule:legal Expense Fund Regulation (RIN 3209-AS60
Date: Friday, June 17, 2022 5:45:58 PM

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.