From: Steve Sayles
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 4:03:35 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 require 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
- Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistelblowers.