From: Luanne Buchanan
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 4:47:24 PM

Here is my comment.

This rule should NOT be optional, and thus I oppose the proposed legal expense fund regulation as currently drafted,

My comments are as follows:

1 - There should be no exceptions to make compliance optional.
2 - The recusal requirement should be changed to a 5-year recusal requirement that prevents cash donors from having any influence on decisions, policies or regulations that affect them, or any industries in which they have an interest.
3 - Please remove the example of the accused sexual harrasser.
4 - Nonprofit charities should be on an equal footing with large law firms and be allowed to hire legal counsel for whistleblowers.

Sincerely, Dr. Luanne Buchanan