From: Nicholaus Norvell
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 5:04:37 PM

Re-sending to other OGE email address.

On Thu, Jun 16, 2022 at 7:09 AM Nicholaus Norvell <nicholaus.norvell@gmail.com> wrote:

> 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.
>
> Nicholaus Norvell
> San Diego, CA