From: Susan Schmiesing
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 5:08:58 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.
- Place nonprofit charities (501©(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Thank you.

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