From: Jordan Ellel
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 2:50:22 PM

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> I oppose OGE's proposed legal expense fund regulation as drafted. OGE should:
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> -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 decision, 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.
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> Sincerely,
> -Jordan Ellel