From: John B. McDermott
To: Contact OGE
Subject: "Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)"
Date: Friday, June 17, 2022 2:02:29 PM

I oppose OGE's proposed legal expense fund regulation as drafted. OGE should:

1. Remove the exception that makes compliance with the regulation optional.
2. 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;
3. Remove the offensive example involving an accused sexual harasser:
4. 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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