From: S Bendiks
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 2:55:07 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 cash donors from influencing decisions, policies, or regulations affecting them or the industries in which they have a substantial interest(s);
-remove the offensive example involving an accused sexual harasser; and
-place nonprofit 501(c)(3) charities on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Best,
Sonia Bendiks, Esq.