From: Alyson Casey Dewar
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 2:51:48 PM

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From: **Alyson Casey Dewar** <casey0222@gmail.com>
Date: Fri, Jun 17, 2022 at 9:39 AM
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
To: <contactoge@oge.gov>

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.

Alyson Dewar
Winthrop, MA.