From:	Noreen Dougherty
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Tuesday, June 21, 2022 6:47:05 PM

I strongly oppose the OGE's proposed legal expense fund regulation as drafted. OGE should remove the exception that makes compliance optional. This is no different than having no compliance requirements at all.
Also, the proposed recusal requirement needs to be changed to a broader 5-year recusal requirement that prevents cash gift donors from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests.

In addition, please remove the offensive example involving an accused sexual harasser.

Finally, allow nonprofit charities (501(c)(3) organizations) to hire legal counsel for whistleblowers to make them on equal footing with large law firms.