From: Debbie Spangler
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 6:00:50 PM

I **oppose** OGE's proposed legal expense fund regulation **as drafted**. While this is a good idea, it needs some major changes to **improve** it. OGE should:

1. Remove the exception that makes compliance with the regulation optional. This makes no sense!! Those that want to abuse the law and improperly influence appointees, elected officials and their employees will be the ones that opt out;
2. The proposed recusal requirement should be replaced 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. We've already seen in other contexts that one year is simply not sufficient;
3. Please remove the offensive example involving an accused sexual harasser; and
4. Please put nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.