From:	Dustin Mueller
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Tuesday, June 21, 2022 6:59:08 PM

I strenuously oppose the OGE's proposed legal expense fund regulation as drafted.

OGE should, at minimum:
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(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.