From:	Brian Christopher Hamilton
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Tuesday, June 21, 2022 6:28:17 PM

Dear OGE,

RE: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)

I'm writing to vehemently oppose OGE's proposed legal expense fund regulation as drafted, as it is seems deliberately filled with loopholes and does not solve the problem.

In the next draft, 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.

Thank you for your time and attention to this. I hope you will do the right thing since the path to that is so clear.

Sincerely,

Brian Hamilton