From: jay gillen
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Monday, June 20, 2022 10:16:11 PM

I oppose OGE's proposed legal expense fund regulation as drafted. OGE should:

1. remove the exception that makes compliance optional.
2. strengthen the recusal requirement to a broader 5-year recusal
3. remove the offensive example involving an accused sexual harasser
4. allow nonprofit charities to hire legal counsel for whistleblowers.

Thank you.
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