From: Judy Blaisdell
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Monday, June 20, 2022 10:29:19 PM

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

Respectfully,
Judith Blaisdell
Exeter, NH