From: Willard P Mittelman
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Monday, June 20, 2022 10:13:43 PM

I am opposed to OGE's proposed legal expense fund regulation.

OGE should:
(i) remove the exception that makes compliance with the regulation optional;
(ii) replace the proposed recusal requirement with a broader 5-year requirement that prevents donors of cash gifts from influencing decisions, policies, and regulations affecting them or the industries in which they have substantial interests;
(iii) remove the offensive example involving an accused sexual harasser; and
(iv) 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.

Sincerely,
Willard Mittelman