From: Bonita Williams
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Monday, June 20, 2022 10:01:58 PM

A healthy democracy requires that we make every effort to prevent corruption. I am writing to oppose OGE's proposed legal expense fund regulation as drafted. OGE should:

- Eliminate the exception that makes compliance with the regulation optional; it must be mandatory
- replace the proposed recusal requirement with a 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.

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