From: Beverly Richards-Smith
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Monday, June 20, 2022 11:26:43 PM

I am writing to express my opposition to the Office of Government Ethics' (OGE's) proposed legal expense fund regulation. OGE should:

1) eliminate the exception that makes compliance with the regulation optional;

2) 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 industries in which they have substantial interests;

3) remove the offensive example involving an accused sexual harasser;

4) level the playing field for nonprofit charities (501(c)(3) organizations) *vs.* large law firms by allowing them to hire legal counsel for whistleblowers

Sincerely,
Beverly Richards-Smith

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