From: Jay Berkey
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)"
Date: Sunday, June 19, 2022 10:35:23 AM

Hello,

I oppose OGE's proposed 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.

Thank you for the opportunity to comment.

Jay