From: David S
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Sunday, June 19, 2022 10:49:27 AM
Attachments: image.png

This is to let you know that I have actually READ the proposed rule and I'm writing to express my opposition to it. I had expected better.
An optional rule? Why bother? I agree totally with the comment below:

> 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.