From:	Michael Haberman
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Sunday, June 19, 2022 11:40:20 AM

To whom it may concern:
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 example involving an accused sexual harasser;
- place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Gratefully,
Michael A Haberman