From: Irabelkin
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RB 3209-AA50)
Date: Sunday, June 19, 2022 10:43:36 AM

Director:

I oppose OGE's proposed legal expense fund regulation as drafted. OGE should:

- Remove the exception that makes compliance with the regulation optional; making compliance optional strips the rule of any meaning;
- 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.

Please live up to the OGE Director's promise to make legal expense funds "transparent, open, and accessible to the public."

Sincerely,
I. Belkin

Sent from my iPhone