From: Andrew Johnson
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 9:00:50 PM

Dear public comment reviewer,

I strongly feel regulation should actually bind those under regulation rather than providing options with limited repercussions. As such, 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.

Sincerely,
-Andrew Johnson
Laurel, MD