From:	Sean Goodwin
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Tuesday, June 21, 2022 9:38:33 PM

I oppose OGE's proposed legal expense fund regulation as drafted. OGE should:
1) remove the exception that makes compliance with the regulation optional;
2) 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;
3) remove the offensive example involving an accused sexual harraser; and
4) place nonprofit charties (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Sincerely,
Sean Goodwin