From: Gary Gaddis
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3309-AA50)
Date: Tuesday, June 21, 2022 9:08:01 PM

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

. Remove the exception that makes compliance with the regulation optional;

. Replace the proposed recusal requirement with a broader five 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 interest;

. Remove the offensive example involving an accuse 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

Sent from my iPhone