From: KARL HERRUP
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 3:46:36 PM

Dear Sirs and Mesdames:

I oppose OGE's proposed legal expense fund regulation. As drafted there are far too many loopholes that must be closed.

I ask that OGE remove the exception that makes compliance with the regulation optional. This renders the entire effort toothless.

I believe it would be much better if the language describing the proposed short recusal requirement be replaced with a broader 5-year one. Particularly important is that it be worded in such a way as to prevent donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests.

The OGE should also remove the offensive example involving an accused sexual harasser.

Nonprofit charities (501(c)(3) organizations should be on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Thank you for your attention to these issues.

Sincerely,
Karl Herrup

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