From: Al Gollub
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 3:40:37 PM

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 or longer recusal requirement that prevents donors of cash gifts from influencing decision, policies, or regulations affecting them or the industries in which they have substantial interests;
Remove the offensive example involving an accused sexual harasser;
Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.