From: Jack Shelley
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 3:47:00 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 harasser; and

4) 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,

- John S. Shelley

John S. Shelley
16306 Aldersyde Drive
Shaker Heights, Ohio 44120
(216) 308-2614
(he, him)