From: Yolanda M. O"Donnell
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 3:45:05 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;
4. Place non-profit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Thank you.
Yolanda M. O'Donnell