From:	Edie Schaffer
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Friday, June 17, 2022 3:29:31 PM

I write in opposition to OGE's proposed legal expense fund regulation as it is currently drafted.

I urge OGE to make the following revisions:
- Remove the exception that makes compliance with the regulation optional. Compliance should be required.
- Replace the proposed recusal requirement with a five-year recusal requirement preventing cash donors from influencing decisions, policies, or regulations affecting them or industries in which they have a substantial interest.
- Make nonprofit charities on the same footing as large law firms by permitting them to retain legal counsel for whistleblowers.
- Remove the example involving an accused sexual harasser, which is extremely offensive.

Thank you.
Edie Schaffer

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