From: Ruth Burnham
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50
Date: Friday, June 17, 2022 3:13:48 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 broaer 5-year 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; and
-place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by llowing them to hire legal counsel for whistleblowers.

Best regards,

Ruth Burnham
Boulder, CO