From: susangra47@gmail.com
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 3:00:51 PM
Importance: High

I oppose OGE's proposed legal expense fund regulation as drafted. TOO MANY LOOPHOLES!!
OGE should:

1. Remove the exception that makes compliance with the regulation optional. THIS MAKE THE RULE USELESS!
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 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.

This current status really shows your business biases and needs to be changed.

Thank you for your attention to this matter.

Susan Graham