From: Linda Keuntje
To: USOGE
Subject: Fwd: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 3:02:26 PM

I oppose OGE's proposed legal expense fund regulation as drafted. It clearly does not align with Biden Administration's focus on addressing corruption both *at home* and abroad. OGE should:

-reduce the clear and present opportunity for corruption by removing the exception that makes compliance with the regulation optional;

-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. This is in line with similar administration policies on conflicts of interest and threats to relationships, as imposed on Returned Peace Corps Volunteers seeking jobs after their service, for example;

-remove the deeply offensive example involving an accused sexual harasser; and

-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,
Linda Keuntje