From: Ellen Roeckl
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 3:29:16 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 broader 5-year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, or regulation affecting them or the industries in which they have substantial interests:
* remove the offensive example involving an assumed sexual harrasser; 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.

Ellen Roeckl
CA resident