From: d carr
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209–AA50)
Date: Tuesday, June 21, 2022 10:48:08 AM

I oppose the OGE's proposed legal expense fund regulation as drafted.

OGE should:
1) remove the exception that makes compliance with the regulation optional;
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 sexual harasser;
4) place non-profit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.