From: David Smith
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 10:46:07 AM

I oppose 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; 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.

with respect,

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