From: Lianne Ames
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 10:38:59 AM

To Whom It May Concern:

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 regulations affecting them or the industries in which they have substantial interests
- remove the 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.

The director of OGE should fulfill his promise to make legal expense funds transparent, open, and accessible to the public. The regulations for legal expense funds should not be optional or invite corruption in any way. They should also be applied even-handedly so as not to advantage any one type of law firm. The legal expense fund regulations as written are not adequate.

Best,
Lianne Ames

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