From: Kirsten Neilsen
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Sunday, June 19, 2022 12:40:53 PM

Hello --

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

1. No ethics regulation should be optional. Remove the exception that makes compliance optional.
2. Increase recusal requirement from matters involving the donor to a period of five (5) years to prevent a donor from influencing (at least immediately) decisions, policies, or regulations in which they have a substantial interest.
3. Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Thank you.

-- Kirsten Neilsen