From: Sally Biggs
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Sunday, June 19, 2022 6:32:31 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, regulations, or policies affecting them or the industries in which they have substantial interests

Remove the offensive example involving a sexual harasser

Place non-profit charities (501(c)(3) organizations) on an equal footing the large law firms by allowing them to hire legal counsel for whistleblowers

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