From: Patricia McDermott
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Sunday, June 19, 2022 10:24:21 PM

I am writing to oppose the OGE's proposed expense fund regulation as drafted.

OGE should do the following items to improve the regulation:

1. Remove the exception that makes compliance with the regulation optional;

2. Replace the proposed recusal requirement with a 5-year recusal requirement that prevents donors of cash gifts from influencing policies, decisions, or regulations that affect them or the industries in which those donors 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.

Thank you for accepting public comments.

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