From: ROBERT fuller
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Sunday, June 19, 2022 1:21:55 PM

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

I strongly oppose the exception that makes compliance with the regulation optional. Optional compliance has less value than an optional stop sign at a hazardous intersection. Plus we already have optional compliance rules for the Supreme Court which aren't working out too well at present bringing harm to the reputation of, and faith in, SCOUS. Thus the exception that makes compliance with the regulation optional should be removed;

I support replacing 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;

I also support modification of the proposed regulation to place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers;

and I agree with others that the offensive example involving an accused sexual harasser should be removed from the regulation;

Sincerely
Robert Fuller
Newark, DE