From: Kathy Davidson
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Sunday, June 19, 2022 8:02:25 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 theproposed 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 lawfirms by allowing them to hire legal counsel for whistleblowers.
Thank you.
Kathleen Davidson