From: Erik Purins
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Monday, June 20, 2022 8:33:56 PM

Thank you for your hard work on adding regulation to how LEF are handled.

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, policies, or regulations affecting them or the industries in which they have substantial interests; and
- place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

These changes will remove the loop hole for non-compliance, make recusal more straight-forward, and reduce harsh penalties against whistleblowers, who act in our public's interest.

Regards,

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