From:	Erik Ogan
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Monday, June 20, 2022 7:21:57 PM
Attachments:	signature.asc

I am glad the OGE is tackling this problem, but I oppose the proposed regulation as drafted. I believe the OGE should:

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

2. 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;

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.