From: JSK Anderson
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209–AA50)
Date: Tuesday, June 21, 2022 7:03:26 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 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;

remove the offensive example involving an accused sexual harasser;
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.
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