From: Marcia Butchart
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 7:22:38 PM

I oppose OGE's proposed legal expense fund regulation as drafted. OGE should make the following modifications:

- remove the exception that makes compliance with the regulation optional; no public official should have a 'get out of jail free' up the sleeve.
- replace the proposed recusal requirement with a broader 5-year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, or regulations that affect them or the industries in which they have substantial interests;
- remove the offensive example involving an accused sexual harasser;
- place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Regards,
Marcia Butchart
Bellingham, WA 98226

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