From: PAT FITZ
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 2:34:01 AM
Attachments: FVeanf5XwAAMJEb.onq

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.

No compliance should be optional. This is an invitation for corruption, not something that should be allowed in a democracy.

Providing as an example that a member of the military charged with sexual harassment should be allowed to raise funds under this regulation is mind boggling.

Why should a law firm representing a foreign entity or regulated industry be allowed to provide unlimited legal support but a nonprofit charity can't provide legal support for whistleblowers. The industry is not more important than the law the whistleblower is stating is being broken (allegedly being broken).

These are the ethics and regulations of a corrupt government, one, I hope, we're not.