From: Dana Dempsey
To: USOGE
Subject: "Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)"
Date: Tuesday, June 21, 2022 2:33:13 AM

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.

The purpose of this request is to eliminate paths of bypass devised during the previous administration and to make ethical behaviors REQUIRED rather than OPTIONAL with consequences for failure to do so.

Thank you.
Dana Dempsey