From: Amelia Hard
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 7:26:11 AM

I very strongly oppose OGE's proposed legal expense fund regulation as drafted.

OGE should:

- remove the exception that makes compliance with the regulations 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 proposed regulation as drafted is woefully inadequate. Please put the suggested changes in place to strengthen legal expense fund regulation.

Thank you for taking my comment seriously.

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