From: Alex Roston
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 1:36:39 AM

Dear Sir or Madam,

I oppose OGE's proposed legal expense fund regulation as drafted. OGE should:

- remove the exception that makes compliance with the regulation optional - of what use is an optional regulation?
- replace the proposed recusal requirement with a broader 5-year requirement that prevents donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests - and of course, don't make this rule optional either!
- place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers. (Legal counsel for whistleblowers, which is a legal activity, should be on equal footing with legal counsel for people who've actually violated the rules!)

Thanks for your time and attention to this matter,

Alexander Roston