From: Bruce Dravis
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 7:40:58 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 United States is often described as a great experiment in democracy, and in recent years it has undergone strenuous tests of its durability. Now we are engaged in a great civil conflict-- waged along fronts the Framers and Lincoln could not have foreseen, involving mass media, the deployment of vast wealth for self interest and not public good, and the abuse of legal procedures and the abuse by Trump of the power of office-- testing whether this nation can long endure. This rule is a great battle-field of that war.

For the rule of law to protect the public, the law must be mandatory and must not only be enforceable but also enforced.

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