From:	C J Flynn | Cinema Test Tools
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Tuesday, June 21, 2022 6:58:25 AM

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

OGE should, with haste:

• 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.

Thank you,

Charles Flynn
Tujunga, CA 91042