From: David Cohen
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Saturday, June 18, 2022 8:59:01 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 non-profit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

David Cohen