From: Deirdre Dunham
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Saturday, June 18, 2022 8:20:26 AM

I disagree with the draft language of OGE's legal expense fund regularion. The language should be revised as follows:

1) Make compliance mandatory. All language as to optional compliance, or exceptions to compliance should be removed.

2) Revise the proposed recusal requirement to be 5 years. The amended recusal requirement would prohibit donors of cash gifts from influencing decisions, policies, or regulations affecting either themselves or industries in which they have a substantial interest for a 5 year period.

3) Eliminate the example language regarding sexual harassment - it is offensive.

4) Allow non-profit charities (501 (c)(3) organizations) to hire legal counsel for whistleblowers. This would place non-profits on a level playing field with large law firms, which can provide unlimited legal support to officials.

Thank you.