From: Richard Simms
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-1150)
Date: Saturday, June 18, 2022 1:47:41 PM

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 (501c3 organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.