From: Janet Harsh
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Saturday, June 18, 2022 12:23:25 PM

I adamantly oppose OGE's proposed legal expense fund regulation as drafted, since it absolutely should be mandatory and not optional.

In addition to making the regulation mandatory, OGE should:

1. Remove the offensive example involving an accused sexual harasser!!!

2. Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

3. Replace the proposed recusal requirement with a (minimum) 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.

4. Strengthen enforcement mechanisms so it has some teeth.

5. Add public disclosure requirements.

Janet Harsh
1114 Park Court
Tecumseh, MI 49286

P.S. Add enforcement to conflict of interest rules as well.

-