From: Nancy Urbschat
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209 AA50)
Date: Saturday, June 18, 2022 1:05:32 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 (501(c)(3) organizations) an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Sincerely,
Nancy Urbschat

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