From: William Gordon
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Saturday, June 18, 2022 4:36:40 PM

I oppose OGE's proposed legal expense fund regulation as drafted. OGE should:

1. remove the expectation that makes compliance with the regulation optional
2. replace the proposed recusal requirement with a broader 5-year recusal requirement that prevents donors of cash gifts from influencing decision, policies, or regulations affecting them or the industries in which they have substantial interests
3. remove the offensive example involving an accused sexual harasser
4. place 501(c)3 nonprofit charitable organizations on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Dr. William Gordon

3442 Manor Hill Dr, Cincinnati OH 45220