From: Allan Rogstad
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209–AA50)
Date: Saturday, June 18, 2022 5:44:40 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 1-year recusal requirement with a broader recusal requirement which prevents recipients of monetary donations from participating or influencing decisions, policies, or regulations affecting themselves or the programs/industries from which they have received substantial donations for the duration that they hold public office;**
- **remove the offensive example involving an accused sexual harasser; and**
- **place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.**

Respectfully,

Allan F. Rogstad
USAF Retired