From: Michael Moran
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Saturday, June 18, 2022 10:07:22 AM

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