From: Hank Friedman
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Saturday, June 18, 2022 4:50:20 PM

Dear Sir or Madam,

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.

Thank you,

Hugh (Hank) Friedman