From: Charles Danko
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 1:54:40 PM

Dear OGE

I am writing in opposition to 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.

--
Associate Professor
Baker Institute for Animal Health
College of Veterinary Medicine
Cornell University

Website: http://www.dankolab.org
E-mail: dankoc@gmail.com