From: caldron-scrawny0t@icloud.com
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 1:34:52 PM

To Whom It May Concern:

I oppose OGE's proposed legal expense fund regulation as drafted for several reasons.

First, it is nonsensical to write a regulation and make compliance with the regulation optional. You might as well not write a regulation in the first place.

Second, we need at least a 5 year recusal requirement to prevent people who make cash gifts from influencing decisions, policies or even deliberations which affect them or the companies and industries they represent.

Third, as a military officer, I especially do not believe there should be exceptions for military officers accused of sexual harassment.

And lastly, if you are going to allow large firms to use this mechanism to provide legal services (which you shouldn't) then you should at least allow nonprofit 501c3 organizations the same mechanism to defend whistleblowers.

Thank you for your consideration, and I would appreciate acknowledgment of my comments.

-William Warner, LT, USNR