From: carol johnson
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 1:53:20 PM

I am in opposition of the OGE's proposed legal defense 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:

place nonprofit charities (501(c)(3)organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.