From: Jason Togyer
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 1:52:12 PM

Dear Sir or Madam:

I oppose the proposed legal expense fund regulation as drafted. It is unconscionable that public officials could be allowed to decide for themselves whether they are subject to the regulation; in no other type of regulation would such behavior be acceptable. (Imagine optional speed limits. Or optional building codes.)

OGE must protect the public by removing the exception that makes compliance with the regulation optional.

Further, OGE must put sharper requirements for recusal into the regulation. There should be a minimum five-year recusal requirement that prevents anyone who has received a cash gift from influencing decisions, policies or rule-makings affecting them or the industries in which they have pecuniary interests.

Finally, non-profit tax-exempt organizations must be allowed to hire legal counsel to represent whistleblowers. It is the only way to provide these whistleblowers with justice --- by bringing them to some sort of parity with large corporations represented by major national law firms.

Thank you for your time and consideration.