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

I oppose OGE's proposed legal expense fund regulation with optional compliance in the form it is drafted. OGE should instead:

1.) compel mandatory compliance with the regulation, removing the exception that makes compliance with the regulation optional;
2.) 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;
3.) remove the example involving an accused sexual harasser; and
4.) place nonprofit charities ((501(c)(3) and 501(c)(4) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Thank you.