From: Danny Holland
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 5:23:56 PM

Hello,

I have some serious problems with the rule proposed above. Here's what I and others have noticed:

1) The rule is optional, not binding
2) A one year recusal is not nearly long enough
3) The recusal is not broad enough, as officials could work on legislation that benefits people donating to legal defense of politicians during the recusal period
4) Officials are allowed to self-select whether they need to recuse based on their interpretation of public concern
5) While large law firms can fund legal defense without restrictions, non-profit organizations are not allowed to fund defenses for government whistleblowers.

I propose the following changes
1) The rule needs to be mandatory,
2) The period of recusal should be between 4-8 years (preferably, longer than a Senator's term)
3) The recusal needs to be more complete, preventing people in government from drafting, making decisions, implementing policies or regulations, with sectors that affect the organizations donating money,
4) Recusal needs to be decided by independent oversight.
5) Allow nonprofit organizations to fund legal defenses indirectly.

Thank you,
--Danny Holland