From: Dave Pyman
To: Contact OGE
Subject: "Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)"
Date: Friday, June 17, 2022 10:30:29 AM

I oppose OGE's proposed legal expense fund regulations as drafted. OGE should:

- remove 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 and accused sexual harasser
- place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them hire legal counsel for whistleblowers

Sincerely,
David M Pyman
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