From: Katharine Dow
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Monday, June 20, 2022 3:25:13 PM

Good Afternoon,

I am writing to express my concern about the proposed rule: Legal Expense Fund Regulation (RIN 3209-AA50).

I strongly oppose OGE's proposed legal expense fund regulation as drafted. My specific concerns are detailed below:

1. Remove 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 harrasser.
4. Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms, by allowing them to hire legal counsel for whistleblowers.

Thank you for your time and consideration of my concerns. In its current form, especially with the exception that makes compliance optional, it is likely to just be another piece of paper, easily ignored by the unethical, and as such a waste of time and taxpayer money.

Sincerely,
Katharine Dow
Brooklyn, New York

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