From: jsbowpat@aol.com
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)"
Date: Monday, June 20, 2022 3:15:48 PM

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

- remove the 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 an accused sexual harasser, and
- place non-profit 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 attention to this important ethical issue.

Sincerely,

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