From: Candy Derbyshire
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Monday, June 20, 2022 12:53:06 AM

I oppose OGE's proposed legal expense fund regulation 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 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,
Candace E Derbyshire