From: Carl Couch
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Monday, June 20, 2022 3:10:15 PM

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.
It is critical that compliance with any proposed regulation be mandatory. To be effective, both in fact and perception, adherence cannot be optional and penalties for failure to comply be clearly articulated.

Thank you for considering my perspective on the proposed rule change.

Carl Couch