From: David Edelman
To: USOGE
Subject: Proposed OGE Regulation - Legal Expense Funds
Date: Monday, June 20, 2022 3:44:11 PM

To Whom It May Concern:

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

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 offensive example involving an accused sexual harasser; and
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.

Please amend this regulation to address these major ethical concerns.

Thank you.

Dr. David B. Edelman
San Diego, CA

Sent from my iPhone