From: Barnaby Levy
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Monday, June 20, 2022 2:49:18 PM

I strongly oppose OGE's proposed legal expense fund regulation as drafted. The OGE should:
1. remove the exception that makes compliance with the regulation optional (this neuters the regulation completely)
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 (without a strong recusal requirement some will be tempted to weather the penalty in favor of the ill gained benefits)
3. remove the offensive example involving an accused sexual harasser; and
4. 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 (there should be no discrimination based regarding the ability to hire counsel).

Thank you very much for your time,
Barnaby
323.401.8642