From: Helen Whatley
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Monday, June 20, 2022 2:55:31 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 mandatory 5-year recusal requirement that also 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, and to provide unlimited legal support for whistleblowers.

Thank you for your prompt consideration,

Helen Whatley
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