From: Britton Burdick (Britton T. Burdick)
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 12:59:39 PM

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

1. Remove the except that makes compliance with the regulation optional;
2. Replace the proposed recusal requirement with a broader five-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.

Thank you,

Britton T. Burdick
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