From: william bradwell
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 11:16:19 AM

I strongly 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 interest;
-remove the offensive example involving an accused sexual harrasser, and
-place non-profit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistle-blowers.