From: Pam Halsey
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 11:08:07 AM

I am very opposed to the 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;
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; and
5) strengthen oversight to ensure compliance with the regulation to provide assurance that conflicts of interest are not allowed.