From: Michele Bayuk
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 11:06:31 AM

I OPPOSE OGE's proposed 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 recrusal requirement that prevents donors of cash gifts from influencing the decisions, policies, or regulations affecting them OR the industries in which they have interests;
- Place nonprofit charities (501c3 organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Thank you.