From: Peg Hausman
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 11:02:53 AM

Good morning! I'm deeply concerned about OGE's proposed legal expense fund regulation as drafted and am writing to express my opposition. The optional nature of compliance with the regulation is unacceptable, as is the narrowness of the recusal requirement. The treatment of nonprofits is also unfair.

To make the regulation acceptably effective, 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 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 whistleblowers.

Thank you for your attention.

Margaret J. Hausman
3437 E. Longview Ave.
Bloomington, IN 47408