From: A. D. Reed
To: USOGE
Subject: Proposed rule: legal expense fund regulation (RIN 3209-AA50)
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I oppose the Office of Government Ethics proposed regulation on legal defense fund regulation as drafted. Rather, the OGE rule should:

- Remove the exemption 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 that influence them or the industries in which they have substantial interests;

- Remove the offensive example involving an accused sexual harasser; 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 whistleblowers

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