From: J. McGeary
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 1:44:34 PM

I oppose OGE's proposed legal expense fund as drafted. Instead, OGE should:

- Remove the exception making compliance with the regulation optional (if it's optional it's not a regulation, it's a vague sort of handwaving suggestion)
- replace the proposed recusal recquirement with a broader five 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 HIGHLY 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.