From: Paul Moreau
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 1:37:20 PM

To whom it may concern,

I oppose OGE's proposed legal 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 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.

Regulations that are optional, are not regulations.