From: John Crowley
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 4:18:33 PM

To Whom It May Concern:

I oppose OGE's proposed legal expense fund as drafted. Instead, OGE should:
1) remove the exception that makes compliance optional
2) replace the proposed recusal requirement with a 5 year recusal requirement that prevents donors of cash gifts from influencing the regulated's decisions, or proposed policies or regulations affecting them or the industries in which they have substantial interest.
3)remove the example of an accused sexual harasser
4)place 501(c)(3) organizations on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers

I believe our officials need to be held to higher standards than currently proposed by OGE.

Respectfully,
John Crowley