From: Carol Patterson
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 12:35:21 PM

I oppose the OGE's proposed legal expense fund regulation as drafted. OGE should strengthen its proposal in these ways:
1) Remove the exception that makes compliance with the regulation OPTIONAL;
2) 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;
3) Remove the offensive example involving an accused sexual harasser;
4) Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.