From: Margaret Kidd
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 3:29:19 PM

I oppose the OGE proposed legal expense fund regulation as drafted. OGE needs to:
1) Eliminate the exception that makes compliance with the regulation optional;
2) Establish a minimum 5-year recusal requirement which would make the proposed 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) Removal of the offensive example noted by POGO involving an accused sexual harasser;
4) Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by assuring their ability to hire legal counsel for whistleblowers.