From: bob s
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 3:45:27 PM

I oppose OGE's proposed legal expense fund regulation as you've written it.

Instead, OGE ought to:

- ensure that compliance with the regulation is mandatory, not voluntary
- ensure inclusion of 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;
- place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.
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Bob Stern
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