From:	Steven Danforth
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Tuesday, June 21, 2022 3:25:07 PM

I oppose the OGE's proposed legal expense fund regulation as currently drafted. OGE should:
A) Remove the exception that makes compliance with the regulation optional;
B) 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;
C) Remove the offensive example involving an accused sexual harasser;
D) Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.