From: Penelope Newcomb
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 3:31:16 PM

I strongly oppose OGE's proposed legal expense fund regulation (RIN 3209-AA50) as it is currently drafted.

These changes should happen before the bill goes to vote.

OGE should:

- Remove the exception that makes compliance with the regulation optional; Compliance must be required. Obviously.
- 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;
- Remove the offensive example involving an accused sexual harasser; and
- Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Thank you, Penelope Newcomb