From: Karim Merchant
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 12:43:03 PM

Dear Sir/Madam,

I vigorously oppose OGE's proposed legal expense fund regulation as it is currently drafted.

Instead, I urge OGE to:

- **Remove** the exception that makes compliance with the regulation optional;
- **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 deeply offensive example involving an accused sexual harasser; and
- **Allow** nonprofit charities (501(c)(3) organizations) to hire legal counsel for whistleblowers, thereby placing them on an equal footing with large law firms.

Thank you for your attention,

Karim Merchant

Torrance, California