From: Nick Latitude
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209–AA50)
Date: Friday, June 17, 2022 6:06:08 PM

Previously, I sent the below comment to OGE's normal email address of contactoge@oge.gov

Because of the requirement to send my comment as a member of the public to this special email address I am now resending this comment for OGE's consideration opposing the proposed legal expense fund as drafted. I support the need for a legal expense fund regulation but oppose the draft rule.

OGE should:

- 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 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.

Sincerely,

Matthew Brekus