From: Kenneth Peress
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 6:20:07 PM

I oppose OGE's proposed legal expense fund regulation as drafted. OGE should:
1) remove the exception that makes compliance with the regulation optional;
2) replace the proposed recusal requirement with a broader five (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;
3) remove the offensive example involving an accused sexual harasser: and
4) place non-profit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Thank you.

Ken Peress
10110 N Twin Lake Road
MancelonaMI 49659

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Ken Peress, D. Ed.
Vice President for Student Affairs (retired)
Lake Superior State University

"The fact is I don't drive just to get from A to B. I enjoy feeling the car's reactions, becoming part of it."
Enzo Ferrari