From: Joe Chlebanowski
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 7:23:29 PM

I oppose OGE's proposed legal expense fund regulation as drafted.

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.

Best regards,

Joseph M Chlebanowski