From: james sluka
To: USOGE
Cc: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 8:25:38 PM

To: OGE comment system

I oppose the 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 or the industries in which they have substantial interests
- Remove the offensive example involving an accused sexual harasser; and
- Place nonprofit charities (501©(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers

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