From: Jon Peirce
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 10:41:14 PM

To whom it may concern:

I oppose OGE's proposed legal expense fund regulation as currently drafted. Here are the changes I believe appropriate:

1. Remove the exception that makes compliance with the regulations optional

2. The recusal requirement should be replaced with a 5-year recusal requirement which prevents cash donors from influencing decisions, policies or regulations that affect them or the industries in which they have substantial interests.

3. Non-profit 501(c)(3) organizations should be placed on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Sincerely,
Jon Peirce