From: Joyce Bolton
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 7:36:45 PM

I oppose OGEs 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 5-year 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 nonprofits charities (501)(c)(3) organization(s) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

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