From: Hart Wilson
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 7:56:47 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.

The proposed language makes a mockery of the whole idea behind the regulation. We need more ethical accountability, not more self-reporting, self-dealing misconduct.