From: Rob Ferrara
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 6:10:07 PM

Hello,

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

* remove the exception that makes compliance with the regulattion 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 interest;
* remove the offensive example involving an acused sexual harasser; and
* place non profit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing then to hire legal counsel for whistleblowers.

Hank you,

Rob Ferrara