From:	Cheri Haggerty
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Friday, June 17, 2022 8:06:46 PM

I oppose OGEs proposed legal expense fund regulation as drafted. OGE should do as follows:
1) remove the exception that makes compliance with the regulation optional. An "optional" regulation is absurd and won't be followed;
2) replace the proposed recusal requirement with a broader five-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;
3) remove the offensive example involving an accused sexual harasser; and
4) place nonprofit charities (501(C)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Stand up for justice!