From: Ian Pravata
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 10:02:00 AM

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**.

Thank you.
Ian Pravata