From: Richard Byrne
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 10:42:33 AM

Dear OGE:

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

The OGE should amend this draft to:

* Remove the exception that makes compliance with the regulation optional. (This exception obviates the entire intended effect of the regulation!)

* Replace the proposed recusal requirement with a broader 5-year recusal requirement to prevent 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.

* 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!

Yours, Richard

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