From: D.W. Gregory
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 10:18:36 AM

To whom it may concern:

I have read of OGE's proposed legal expense fund regulation and I am opposed to it as drafted.
The OGE should remove the exception that makes compliance with the regulation optional. Are you kidding me? Why should compliance with ANY regulation be optional? It's not a regulation if it is optional. It is corrupt window dressing.

Also, the OGE should:
1. 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;

2. remove the offensive example involving an accused sexual harasser; and 3. place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

I do not understand how you could come up with something so utterly toothless -- it seems as if the drafters of the regulation have gone out of their way to create something that LOOKS like it address/prevents corruption when in fact it INVITES it.
You should be ashamed even to consider this.
D.W. Gregory
Shepherdstown, WV

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DW Gregory is the author of MEMOIRS OF A FORGOTTEN MAN, RADIUM GIRLS, and SALVATION ROAD. Look for the Washington, D.C. premiere of Memoirs of a Forgotten Man at Washington Stage Guild May 5-29, 2021.

You can check out much of my work at this link on the National New Play Network's New Play Exchange. MEMOIRS OF A FORGOTTEN MAN is available on the new play exchange and in an anthology from Methuen Publishing, 'Five Plays by Women from the Contemporary American Theatre Festival.' RADIUM GIRLS and SALVATION ROAD are

available from Dramatic Publishing. Read more about me at my website.

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