From: Paul W
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 10:09:46 AM

I agree with the entirety of the statement below:

> 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.

Further, I recommend significant penalties as a deterrent to any corrupt or criminal activity by any person holding a title of public trust, with mandatory minimum prison sentences for recidivism.

Thank you,
Paul Westlake
Fishkill, NY