From: Carmen Ferguson
To: USOGE
Subject: Proposed Rule: legal Expense Fund Regulation (RIN 3209-AA50
Date: Tuesday, June 21, 2022 12:12:20 PM

I oppose OGE's proposed legal expense fund regulation as drafted. Instead OGE should:
1.remove the exception that makes compliance with the regulation optional.
2. Replace the recusal requirement with a broader 5 year recusal requirement that prevents donors of cash gifts from influencing decisions, policies or regulations affecting them or industries in which they have substantial interests.
3. remove the offensive example involving an accused serial sexual harrasser.
4. Place non profit 501 C 3 organizations on equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Thank you for following my suggestions.

Sincerely,
Carmen Ferguson
Galena, Illinois