From:	rr strickler
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Tuesday, June 21, 2022 12:14:42 PM

Hello,

As drafted, OGE's proposed legal expense fund regulation is insufficient. 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
- **allow** nonprofit charities (501(c)(3) organizations) to hire legal counsel for whistleblowers, putting them on an equal footing with large law firms

Thanks ,
Rachel Strickler