From: Shasta Walton
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 12:16:43 PM

I oppose OGE's proposed legal fund resolution as drafted. OGE should:
*Remove the exception that makes the compliance w/ regulation optional;
*Replace the proposed recusal requirement w/ the broader 5-year recusal requirement that prevents donors of cash gifs 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 w/ large law firms by allowing them to hire legal counsel for whistleblowers.

Thank you for your consideration,
VT Speer
Former federal investigator