From: Piers Turner
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 12:15:03 PM

The OGE's proposed legal expense fund regulation is deeply problematic because it makes compliance with the regulation optional.

I also would replace the proposed recusal requirement with a stronger 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.