From: Willis Markuske
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 4:28:11 PM

I oppose the OGE's proposed legal expense fund regulation as currently drafted. OGE should:
1) Remove the exception that makes compliance with the regulation optional;
2) Replace the proposed recusal requirement. Instead a broader 5-year recusal requirement that prevents donors of cash gifts or substantial non-cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests;
3) Remove the highly offensive and inappropriate example involving an accused sexual harasser;
4) Grant nonprofit charities (501(c)(3) organizations) equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.