From: S Gee
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation RIN 3209-AA50
Date: Tuesday, June 21, 2022 4:03:10 PM

Dear Sir or Madam:
I object to OGE's proposed rule on Legal Expense Fund Regulation as drafted.
In particular, I oppose:
1. any exception that makes compliance with the regulation optional;
2. the proposed one-year recusal requirement as too limited in time and scope (better: 3-5 years required recusal to prevent cash donors from influencing policies or regulations affecting their interests);
3. not allowing 501(c)(3) organizations to hire/fund legal counsel for whistleblowers despite permitting law firms to do so; and
4. use of the example of an official accused of sexual harrassment.
Sincerely,
S Gilligan