From: Sandra Madera
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 4:20:06 PM

To Whom It May Concern:

I oppose OGE's proposed legal expense fund regulation as drafted. ORE 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 or in-kind gifts from influencing decision, 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 with large law firms by allowing them to hire legal counsel for whistleblowers.

Thank you,
Sandra Madera
Los Angeles, CA