From:	Jeanne Tanner
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Tuesday, June 21, 2022 8:31:22 AM

What is the point of having an ethics rule that is optional and riddled with opt outs? That's not a rule - that's a map for unethical behavior!

I agree with Walter Shaub and I oppose OGE's proposed legal expense fund regulation as drafted.

OGE 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 gifts 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 with large law firms by allowing them to hire legal counsel for whistleblowers.

Sincerely,
Jeanne Tanner