From: Douglas White
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 8:59:37 AM

This rule should NOT be adopted. Government ethics are not 'optional'.

OGE should:

1) Remove the exception that makes compliance with the regulation optional;
2) Replace the proposed recusal requirement with a broader 5-year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, or 3) Regulations affecting them or the industries in which they have substantial interests;
4) Remove the offensive example involving an accused sexual harasser; and
5) Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

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