From: C. Rogers
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Redulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 9:47:59 AM

I oppose OGE's proposed legal expense fund as drafted.

OGE should:

1. Remove the exception that makes compliance with the regulation optional. Everyone should be held to the same ethical standard.

2. 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 issues.

3. Remove the offensive example involving an accused sexual harasser. There are certainly other examples that can be used.

4. Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistle blowers.

Now more than ever, we need to lead the fight against corruption.

Thank you for your time and consideration

regards, Carolyn Rogers