From: Susan Oliver
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 9:54:19 AM

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 prevent donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interested
- remove the offensive example of involving an accused sexual harasser; and
- place non-profit charities (501 (c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers

Ethics in government should not be optional!

With all sincerity,
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