From:	DJ Bates
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Tuesday, June 21, 2022 9:21:16 AM

To Whom It May Concern:

As a retired Federal employee, I have always supported not only the concept, but the practice, of ethics in government at all operational levels.

I am writing in response to the above cited Proposed Rule.I oppose OGE's proposed legal expense fund regulation as drafted.

OGE should make the following revisions to this Proposed Rule:

- remove the exception that makes compliance with the regulation optional; the potential breach of ethics is much too significant to make it optional for anyone.
- replace the proposed recusal requirement with a 5-year recusal requirement that has a wider scope, and that specifically prevents donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests.
- place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

As I state above, I support not only the concept, but the practice, of ethics in government. No government can long function productively if it makes ethical behavior mandatory for some and optional for others.

Thank you for considering my comment to the Proposed Rule.

Sincerely,

Doris J. Bates, Ph.D.

Retired Federal Employee