From:	Ruth Phinney
To:	Contact OGE
Subject:	Currently proposed ethics "regulation" is not
Date:	Thursday, June 16, 2022 2:15:23 PM

To whom it may concern,

It appears your so-called proposed regulation is nothing of the sort. When you make compliance with rules optional, you allow those currently acting in extremely unethical manner (note I am not claiming illegality) to simply continue their status quo. You penalize those who behave ethically. **You fail the citizens of this country and fail to perform your own mandate**.

Please change your proposal into a true regulation, which will at least have a chance of influencing behavior, minimizing corporate interference in the body politic, and return voice to the human citizens of this country:

Remove the exception that makes compliance with the regulation optional.
Replace the proposed recusal requirement with a broader 5-year recusal requirement, preventing 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 military sexual harasser; intimidation of victims has no place in such a regulation and the military should enjoy no special favors.
Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms: allow them to hire legal counsel for whistleblowers.

Sincerely yours,

Ruth Phinney
Portland, Oregon