From: Catherine Scallen
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209–AA50)"
Date: Thursday, June 16, 2022 2:54:20 PM

Dear OGE Administrators:

I write as a concerned citizen to state that I STRONGLY 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 prevents 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 sexual harasser; and
- place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

VOluntary compliance? That is an absurdity as a proposition and undermines government ethics. These rules should be strengthened, not weakened.

Sincerely, Catherine B. Scallen