From: Contact OGE
To: USOGE
Subject: FW: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 2:09:42 PM

From: Lena McGuire [mailto:lenamcg@verizon.net]
Sent: Thursday, June 16, 2022 2:07 PM
To: Contact OGE <contactoge@oge.gov>
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)

I oppose the Office of Government Ethics proposed legal expense fund regulation as drafted and want the following changes incorporated into the draft:

- remove the exception that makes compliance with the regulation optional - regulations should NOT be optional! This is basic common sense.;

- replace the proposed recusal requirement with a broader 5-year recusal requirement. This will help prevent donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests which is the best way to then protect all of us;

- 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.

Without these changes, the draft contains giant loopholes that will allow for massive corruption. Americans deserve better than optional ethics for top officials. Please rewrite this rule to remive these loopholes and make a the regulation better.

Thank you,

Lena McGuire

Camillus, NY