From: S R
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 2:41:06 PM

To whom it may concern,

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 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.

I firmly believe optional ethics rules are no rules at all, and an invitation to corruption. However, put these changes in place, & I think the the new regulation will work against it.

Thank you for your attention to this matter.
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