From: Debra Doggett
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 2:07:24 PM

I am writing to you to express my vehement opposition to the OGE's proposed legal expense fund regulation as drafted. Ethics should NEVER be optional and to have the official involved be allowed to decide whether or not they should adhere to the ethical rules is ridiculous and creates an opening for corruption. In the current climate of mistrust toward government, to have a regulation which allows a government official to decide if they want to follow ethical practices is a betrayal of the American people.
OGE should:
remove the exception that makes compliance with the regulation optional
replace the proposed recusal requirement with a broader five 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
place nonprofit charities (501c3 organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers

Restoring trust in government is of the utmost importance during this difficult time. Continuing to allow the kind of lax ethical behavior of the past undermines that important goal.

Sincerely,
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