From: Anne Freas
To: Contact OGE
Subject: "Optional" Ethics Rules
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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.

In closing, we all know that human nature can be and is tempted, all the time, to choose an easier path than being ethical. The way this draft is currently written gives the unethical among us a blueprint how to "opt out" of principled behavior.

Anne Freas

1696 Southlawn Drive
Lancaster PA 17603

aborogove@comcast.net