From:	Kir Talmage
To:	Contact OGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Friday, June 17, 2022 9:40:00 AM

To all people in the the US Office of Governmental Ethics:

I oppose OGE's proposed legal expense fund regulation as drafted. It's got significant, major, unacceptable, ethical problems.

INSTEAD:
OGE should:

- **REMOVE** the exception that makes compliance with the regulation optional. (Optional regulations are vehiclesfor corruption.)

- **INCLUDE** nonprofit charities (501(c)(3) organizations) on the same level as large law firms; they too should be able to easily hire legal counsel for whistleblowers. Have you noticed yet that whistleblowers, trying to write wrongs, already have a hard time? Do not make it harder!

- **REPLACE** the proposed recusal requirement with a more significant and protective 5-year recusal requirement to prevent donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests; 5 years at a minimum would span an entire presidential term, which improves the resistance-to-corruption better than a one-year recusal can, and thus makes the overall system of power less vulnerable

- **REVIEW and REMOVE** unfortunate examples (example: the one about about accused sexual harasser; where have you all BEEN?)

Thank you very much, I look forward to your improvements.

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