From: Betsy Novotny
To: Contact OGE
Subject: "Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)"
Date: Friday, June 17, 2022 8:49:06 AM
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To whom it may concern:
I am writing in response to the proposal that allows government officials to opt out of ethics rules. Here are my suggestions to make compliance an obligation, not an option:

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.