From:	Julie Corkran
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Friday, June 17, 2022 7:49:40 AM
Attachments:	image.png

I am a former federal employee (USEPA, retired), former State employee (Ohio EPA, retired) and a former volunteer on a standing board under my municipality's charter: in each capacity, strong ethics rules were foundational to public trust in decision-making. Accordingly, I am writing to express concerns about RIN 3209-AA50.

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.

Thank you for your attention to these concerns in advance of finalizing the ethics rule and in support of restoring a basis for citizen trust in our government.

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