From: Jean Paul
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 12:54:20 AM

To Whom It May Concern:

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.

Ethical rules shouldn't be optional when the alternatives allow for unethical behavior to continue because people who are unethical will not opt for an ethical option if an alternative exists. And allowing the official to decide whether or not the public should be concerned about their impartiality seems fairly reckless, because again, people doing unethical things are going to decide that the public doesn't need to be concerned about anything they do so that they can continue to do whatever serves them best.

Thank you.