From: Michelle Mannering
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
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This draft regulation should be an embarrassment to the Office of Government Ethics. I certainly cannot support a regulation that makes ethical conduct while holding a government office optional. In fact, as an American citizen, I believe those who hold government offices should be held to the highest standards of ethical conduct -- nothing less, no exceptions. That was certainly what I was taught to expect from the government of the United States.

Let me spell out my objections, although I find it appalling that I apparently need to:
I oppose the OGE's proposed legal expense fund regulation as drafted. OGE should:
1) Remove the exception that makes compliance with the regulation optional;
2) 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;
3) Remove the offensive example involving an accused sexual harasser;
4) Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.