From: Pilar Goldstein-Dea
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 11:31:15 PM

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.

"Optional" ethics rules in DC sounds like a bad joke; indeed it's the seed of undoing in good people's lives. I for one am wholly opposed to giving unethical people any extra leverage against them.
Thank you,
Pilar Goldstein-Dea