From: Mike Mattison
To: USOGE; Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 11:27:47 PM

Today's Date: 06/16/2022

Attention: U.S. Office on Government Ethics (OGE)

Email: usoge@oge.gov, contactOGE@oge.gov

Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)

To Whom it Concerns:

I oppose OGE's proposed legal expense fund regulation as drafted.

Upon careful consideration, 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.

Thank you.

M. Mattison