From: Carrie McIlvenna
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209–AA50)
Date: Thursday, June 16, 2022 4:15:04 PM

Greetings,

I write today to share my opposition to 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.

Tell OGE to *say no to optional government ethics*. If we're ever going to root out corruption and hold those in power accountable for unethical practices, it won't happen by giving them the ability to opt-out.

Thank you,

Carrie McIlvenna

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