From: Kathleen Cushman
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 4:52:00 PM

To the rulemakers at the Office of Government Ethics,

I'm writing to say that 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.

I'm sure you're aware that without making these changes the rule contains giant loopholes that will allow for massive corruption. America deserves better than optional ethics for top officials. Please rewrite this rule and make it better!

Thanks.

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