From: Mark Schofield
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 4:38:58 PM

To Whom it May Concern:

I am writing regarding the Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50), and to make the following objection and/or public comment.

I oppose the Office of Government Ethics (OGE) 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 recusal requirement - perhaps for a period of five years of service or until the next change in Presidential Administration - 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.

Thank you for your consideration of this objection and public comment.
Mark A. Schofield