From: Nancy Parker
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 12:33:18 PM

I oppose OGE's proposed legal expense fund regulation as drafted. It is worthless as written, because there is no such thing as OPTIONAL ethics! OGE should
1. remove the exception that makes compliance optional
2. replace the proposed recusal requirement with a broader 5-year requirement that prevents donors of cash from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests (no exceptions or wiggle room)
3. place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Sincerely,
Nancy Parker
Caldwell, Idaho