From: Lori Karkosky
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 3:59:00 PM

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

I believe that OGE should:

- Remove the exception that makes compliance with the regulation optional. Ethical behavior can not be 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

- 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,

Lori Karkosky