From: Mark McKennon
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 3:25:10 PM

I oppose the OGE's proposed legal expense fund regulation as drafted. OGE should:
1) Remove the exception that makes compliance with the regulation optional;
2) 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;
3) Remove the offensive example involving an accused sexual harasser;
4) Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.
5) ANY FAILURE OF A GOVERNMENT AGENCY TO ESTABLISH STRICT STANDARDS OF ETHICAL CONDUCT THAT WOULD RESTRAIN OR ELIMINATE THE SALE OF GOVERNMENT INFLUENCE AND CORRUPTION IS ITSELF BY DEFINITION A FORM OF CORRUPTION. GOVERNMENT IS HIRED BY THE.PEOPLE TO GOVERN, NOT TO SELL AND BUY LAWS, LEGISLATION, REGULATION AND FORMS OF ACCOUNTABILITY.