From:	Antonio Rocha
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Tuesday, June 21, 2022 12:39:44 PM

I oppose OGE's proposed legal expense fund regulation as drafted. Ethical behavior should not be optional. It is the least that should be expected of our government officials, both elected and appointed. It is unimaginable that any institution, least of all our government, should allow any unethical behavior or that they should punish those who come forward to report such.

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.

Thank you for reading this,
Carol and Antonio Rocha