From: Johnson,Douglas F
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 12:53:53 PM

Dear Sirs, Madams,

I oppose the Office of Government Ethics proposed legal expense fund regulation as drafted:

First, regulation should be regulation, an enforceable rule not an option. Making a rule/regulation option makes it meaningless.

Second, donors should not be allowed to directly influence decisions, policies, or regulations affecting them or the industries in which they have substantial interest. This is necessary to distinguish financial support from bribery. This is particularly important in a political and social climate in which government is already widely considered to be ineffective at worst and corrupt at best. Therefore, the recusal requirement should be as long as possible and at least 5 years if not longer.

Finally, nonprofit (501(c)(3) organizations, especially charities, *must* be given an equal standing with large law firms by allowing them to hire legal counsel for whistleblowers. Once again, and as previously mentioned, this change is critical at at time of widespread public antipathy toward, and lack of trust in, government, including the believe that government, and the rule of law in general, are weighted against "the people" in favor of oligarchic interests.

I believe these recommendations will help redress the general public impression that "government ethics" is an oxymoron.

Peace,

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