From: Dawn Henry
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 10:53:36 PM

Good evening,

I have read provisions of this proposed regulation and strongly oppose it as drafted. OGE should

- remove the exception that makes compliance with the regulation optional. Why should it be optional to act ethically while in public service?
- replace the proposed recusal requirement with a broader five year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, or regulations;
- 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.

As someone who is helping prepare the next generation of public servants, I believe ethical practice is a minimum expectation, not an indicator of excellence, nor an option that can be rejected.

Thank you for your consideration of this matter.

Sincerely,

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