From: Susan O"Brien
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 6:57:08 PM

ETHICS RULES SHOULD NOT BE OPTIONAL!

I oppose 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; and
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.

Thank you,
Susan O'Brien