From: Patricia Jaeger
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3205-AA50)
Date: Thursday, June 16, 2022 10:50:29 AM

I oppose OGE's proposed legal expense fund regulation as drafted. 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 byallowing them to hire legal counsel for whistleblowers.

I taught ethics in graduate MBA and accounting masters programs for more than 25 years. The idea that an ethical rule can be "optional" makes that rule the antithesis of ethics. It is way past time for the OGE to actually stand up for ethical practices.

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