From: Jill Moore
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 11:51:32 AM

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 place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Personal Comment: This is the Office of Government Ethics, right? These are common sense ethical requirements. If, as officials preparing such regulations, you can not see how unethical this regulation is with out these changes you should not be working in the OGE. The idea is NOT to give the fox access to the hen house on a voluntary basis. Seriously, do better.

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