From: Sara Steinhoffer
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
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I oppose the OGE's proposed legal expense fund regulation as drafted as it makes a mockery of conflict of interest laws, regulations and norms. This is the type of thing that creates cynicism among the populace, leading to apathy and disengagement in vital democratic activities such as voting. In other words, it is exactly what this country does NOT need!

Instead, 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;
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.