From:	Mark Schrider
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Tuesday, June 21, 2022 12:07:11 PM

I oppose the OGE's proposed legal expense fund regulation as drafted. OGE should:
1) Remove the exception that makes compliance with the regulation optional. Ethical behavior on the part of government officials...elected or appointed...is NOT 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. Government service should NOT be a cash cow to be milked at the expense of the public good.
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.