From: kathhf@verizon.net
To: Contact OGE
Subject: Ethics
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I understand this involved optional ethics practices as outlined by the OGE.

Optional ethics are not acceptable; just as it's not optional to lie to the FBI; just as it's not optional to answer a subpoena; just as it's not optional to skip paying taxes.

If anything, ethics standards should be higher and enforcement should be more vigorous.

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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;
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.