From: rich.price@verizon.net
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 2:55:49 PM

I oppose the Office of Government Ethics' proposed legal expense fund regulation in its current form. Elements that are objectionable include:

- The exception that makes compliance optional. Ethics should not be optional.
- The proposed recusal requirement. The requirement should have a long-term requirement (at least five years) preventing donors of funds from influencing regulations and policies that affect them and their interests.
- Nonprofits should have the same standing as law firms to hire legal counsel for whistleblowers.
- Military officers being court-martialed for sexual harassment should not be given an advantage over their accusers by being entitled to raise funds to defend themselves. The deck is stacked against accusers already - whoever thought this was an ethical approach should be reassigned.

Best regards,

Richard Price