From: Beer Mann
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 2:31:57 PM

To Whom it may concern:
You are an ETHICS organization.
HAVE some ETHICS yourselves !!!

I oppose OGE's proposed legal expense fund regulation as drafted.
OGE should:
1) Remove the exception that makes compliance with the regulation optional. Compliance to an ethical position CANNOT be "OPTIONAL"!
2) Replace the proposed recusal requirement with a 5 or 10-year recusal requirement that prevents donors from influencing decisions, policies or other regulations that affect them or the industries they represent.
3) Remove the HORRIBLE example of a sexual harasser
4) Place Non-Profit charities on equal footing with large corporations by allowing them to hire legal counsel for whistleblowers.

PLEASE reconsider your current Expense Fund Regulation.

Sincerely
Larry Hoffman