From: Steve Krum
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 2:00:35 PM

Good Afternoon,
I would like to voice my opinion regarding OGE's proposed legal expense fund regulation as drafted. I firmly believe OGE should:

- remove the exception that makes compliance with the regulation optional;
- 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;
- remove the offensive example involving an accused sexual harasser; and
- place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

I firmly believe that all publicly elected and appointed government officials should be held to the highest ethical standards, and as much as humanly possible, be the upstanding examples of fairness, objectivity and service that all American citizens deserve. Please make the above changes as forthright and without delay.

Thank you,

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