From: peter melde
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 2:43:11 PM

I'm writing to express my opposition to OGE's proposed rule RIN 3209-AA50 as it is supportive of continued corruption within our democratically elected government. As we are witnessing in the ongoing January 6 committee hearings, the threat to our democracy and open and accountable government is real and critical. Officials and government influencers should be held to mandatory ethical standards of the highest order and these standards should only be strengthened, not weakened. The very actors who proposed this rule initially are the ones who are being called out for their corruption and attempt to overthrow our democracy. Do not make this kind of activity legal.

I oppose OGE's proposed legal expense fund regulation as drafted. 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.

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