From: Woodspath
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)"
Date: Friday, June 17, 2022 4:11:27 PM

The behavior of government employees and officials, no matter what branch of government or military they serve, should be held to the strictest ethical standards at all times. These standards should be mandatory, not optional, and those in breech of the standards need to face meaningful discipline in a timely manner.

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.

Barbara Bouton
Liverpool, NY
-