From: Jim Vander Putten
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 4:11:47 PM

I oppose the Office of Government Ethics proposed legal expense fund regulation as drafted. The Office of Government Ethics should:

1. remove the exception that makes compliance with the regulation optional;

2. 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;

3. remove the offensive example involving an accused sexual harasser; and

4. place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Government ethics are not optional and employees in positions in positions of responsibility must be held accountable for unethical practices, it won't happen by giving employees the ability to opt out.

Thanks… Jim Vander Putten