From: Terri Hill
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 4:06:11 PM
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The OGE is proposing to create *optional* government ethics rules? Seriously? Ethics should never be optional, and if the past few years have taught us anything it's that very few individuals will do what is right...or ethical…on their own accord. We can't be a "nation of laws" and not enforce those laws.

Thereby...
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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.

Sincerely,
Terri Hill