From: Roby McEuen
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 5:54:43 PM

To the Office of Government Ethics (OGE);

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

OGE should:
• Remove the exception making compliance with the regulation optional;
• Replace the proposed recusal requirement with a longer and 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.

If we are going to have ethics reform it needs to have teeth and longevity. Especially since some public servants spend a lifetime, literally, in office and develop relationships with individuals and companies that span generations.

Sincerely,

Roby B. McEuen