From: Laura Mandler
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AS50)
Date: Friday, June 17, 2022 4:10:30 PM

Greetings,

I oppose OGE's proposed legal expense fund regulation as drafted. The changes I would like to see to this regulation are:

- there should be no exception making compliance optional. I currently work in government ethics and the idea that any of our regulations or laws would be optional seems insane to me. Not only because those in positions of public trust should be held to a higher standard but because the administration of optional regulations/rules is likely to be nightmarish.

- replace the current proposed recusal requirement with a broader 5 year recusal requirement to prevent donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests

- remove the example regarding sexual harassment (as someone who experiences sexual harassment, it is not appropriate to have in this situation and may be triggering to those who have experienced it)

- place non-profit institutions on an equal footing with large firms by allowing them to hire legal counsel for whistleblowers.

I appreciate the work of the OGE on these topics, but we need stronger laws and regulations on the federal level to ensure that those in a position of public trust are held to a proper standard befitting their role.

Sincerely,

Laura Mandler