From: Gabriel Lerman
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 2:52:05 PM

I strongly 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.

Optional ethics policies are not sufficient. Our country has found out in very painful ways that anything short of explicit ethics requirements are worthless. Instead, we need to hold our elected and all government officials/workers to the highest of standards.

Thank you,
Gabriel Lerman