From: Jane Elliot
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 2:29:12 PM

Dear Office of Government ETHICS,

We 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.

It appalls us that OGE CHOSE TO MAKE THE REGULATION OPTIONAL! A provision in the regulation says an employee can ignore the regulation and follow existing practices — which include setting up corrupt political organizations like the one the Trump administration set up.

As if that weren't bad enough, the official doesn't have to recuse at all if -- IN THE OFFICIAL'S OWN OPINION -- the public wouldn't be concerned about the official's impartiality in a matter that involves the person who gave the official a wheelbarrow full of cash.

We are American citizens, and we, the public, in fact DO object to these blatantly corrupt Trump era regulations. We can't believe we need to try to convince the Office of Government Ethics to find your ethics, of all things.

Sincerely,

Jane Elliot, and Brian Elliot
Portland, Oregon