From: Jill Frederickson
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 2:16:48 PM

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;
* place nonprofit charities (501c3 organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

ETHICS should not be OPTIONAL.
Regards-
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