From:	Elizabeth Moore
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Tuesday, June 21, 2022 6:28:46 PM

Dear OGE staff,

I am writing to oppose OGE's proposed legal expense fund regulation as drafted. I suggest changing the regulation in the following ways:

- Most important: remove the exception that makes compliance with the regulation optional. Compliance with ethics regulations shouldn't be optional, should it?;
- Also important: 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. Money already dictates too much policy at the expense of those of us without the influence that money can buy. Let's not make that worse;
- As a matter of kindness and sensitivity, please rethink the example involving an accused sexual harasser; and
- As a matter of justice, place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Thank you for your attention and your efforts to guide our elected officials into actually serving the public.
Sincerely,
Elizabeth Moore,
Shoreline, WA