From:	Sarah
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Tuesday, June 21, 2022 6:54:30 PM

Office of Government Ethics

Re: Objection to **Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)**

Dear Officials,

I am a retired federal prosecutor who objects strongly to any government ethics regulation as to which compliance is optional.

Really, that amounts to a proposed Legal Expense Fund Suggestion, not a Regulation. Please remove the exception that makes compliance with the Regulation optional.

Please also

- 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.

These points are good enough for Walter Shaub. So they're good enough for me.

Sincerely,

/s/

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