From: Deirdre Herman
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Monday, June 20, 2022 11:48:12 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; 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.

A provision in OGE's proposed legal expense fund regulation as drafted says an employee can ignore this regulation and follow existing practices — which include setting up corrupt political organizations like the one the Trump administration set up. The United States deserves better than optional ethics for top officials.

Sincerely,
Deirdre Herman
Rochester, Minnesota