From: Jeff Hunt
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Monday, June 20, 2022 10:03:23 PM

To whom (and all) it may concern,

What is the purpose of an ethics rule with optional compliance? Why have rules at all if you don't even have to break them! Most rules are meant to be broken, but not this one! It's optional!

"We'd like you to be a good boy Timmy, but if you're not, well, then forget we ever said anything about you being a good boy."

Of course, ethical people will follow the rule, and of course, unethical people will not!

Please help us, and yourselves, by ridding our Government of corrupt and unethical behavior. It's long past time for a higher standard.

I oppose OGE's proposed legal expense fund regulation as drafted. At the very least, OGE should:

1. Remove the exception that makes compliance with the regulation optional.
2. 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.
3. Remove the offensive example involving an accused sexual harasser.
4. Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Sincerely,

Jeff Hunt
Concerned American Citizen