From:	Glimmersmith Artistry
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Monday, June 20, 2022 10:55:30 PM

To Whom It May Concerrn,

Ultimately, optional ethics mean no ethics. We have seen this time after time when companies are supposed to police themselves. People will get away with whatever they can. If the government won't be a watchdog and live by a set of ethics, who will?

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.

Most sincerely,
Tina Lavoie