From: Karen MacDougall
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Monday, June 20, 2022 9:36:07 PM

To Whom It May Concern:

I oppose OGE's proposed legal expense fund regulation as drafted.

OGE should:

- remove the exception that makes compliance with the regulation optional (ethics in government should never be 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, i.e., close the revolving door of cash-government-post-government jobs and so on and on;
- 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 whistle blowers.

Let's increase incentives for ethical conduct in government and reduce the influence of convoluted cash schemes created to sabotage clean government.

Thank you for your consideration.

Karen Maresca MacDougall