From: Pat Murphy
To: USOGE
Subject: "Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)"
Date: Monday, June 20, 2022 10:46:27 PM

I oppose OGE's proposed legal expense fund regulation as drafted. People entrusted to high positions in government should be strictly held to the highest ethical standards. Lead by example to have the kind of country most of us want.

OGE should:
> - remove the exception that makes compliance with the regulation optional. To have compliance optional means absolutely NOTHING; business as usual. And Business as usual IS NOT WORKING.

> - replace the proposed recusal requirement with a broader 7-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
> - 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,
Patricia Murphy
Portland, OR