From: Karleen Smith
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Sunday, June 19, 2022 10:14:42 AM

I oppose the OGE's proposed legal expense fund regulation as drafted. Making it optional makes it cease to be a "regulation" and become merely a suggestion.

In my opinion, the OGE should:
- Take out the exception that makes compliance with the regulation optional;
- Broaden the recusal requirement to 5 years that prevents donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests;
- Take out the revolting 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.

Thank you for you time and attention to this matter. The ethical boundaries in our current government are incredibly lax, and corruption is much too easy to get away with. All the ethical rules need to be overhauled, but we can start here.

Karleen Smith