From: Elise Howard
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Sunday, June 19, 2022 10:16:54 AM

To whom it may concern at the office of government ethics:

I oppose OGE's proposed legal expense fund regulation as drafted, because it leaves too many loopholes and too much discretion in the hands of those it is meant to regulate.

OGE should:
- remove the exception that makes compliance with the regulation optional;
-replace the proposed recusal requirement with a broader five-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.

I look forward to hearing of the implemention of improved, stronger regulations and safeguards for the American people.

Sincerely,
Elise Howard
New York, NY
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