From: Wini Shannon
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Sunday, June 19, 2022 4:13:17 AM

I oppose OGE's proposed Legal Expense Fund Regulation as it is currently drafted.

Government ethics rules should not be optional. I urge you to make the following revisions to the proposed Legal Expense Fund Regulation:

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.

Place nonprofit charities on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Remove the offensive example involving an accused sexual harasser.

Respectfully,

Wini Shannon
Newark, Delaware