From: John Pfahlert
To: Contact OGE
Subject: Proposed New Government Ethics Rules
Date: Sunday, June 19, 2022 10:38:05 AM

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

OGE should:
– 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;
– 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 would also like to know, if you truly want voter participation, why a full description of these rules is not listed front and center on your website.

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John Pfahlert
Residential Technology Design
941.545.5406
john@resitekusa.com
www.resitekusa.com