From: Sherri Vance
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50
Date: Sunday, June 19, 2022 10:44:48 AM

I oppose OGE's proposed legal expense fund regulation as drafted. It's full of holes and completely ineffective as it is. Here is my feedback. The OGE should::

1. Remove the exception that makes compliance with the regulation optional. What use is this regulation if it is optional?
2. Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms, by allowing them to hire legal counsel for whistleblowers. Otherwise, this regulation sides with the rich and powerful and with the rule-breakers.
3. Replace the proposed recusal requirement with a 5-year recusal requirement that prevents donors of cash gifts from influencing regulations affecting them or industries they're involved with. You're the Office of Government ETHICS after all--this regulation should be stronger in enforcing ETHICS.
4. Remove the offensive example involving an accused sexual harasser. Do you really want to create a regulation that makes it look like you're on the side of sexual harassers?

Please consider these suggestions from a concerned citizen.
Thank you,
Sherri Vance