From: Christine Joyce
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Sunday, June 19, 2022 11:39:57 AM

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

Compliance should NOT be optional!

The recusal requirement should be 5 years AT A MINIMUM and should prevent donors of cash gifts from influencing decisions, policies, etc that benefit or affect their interests or industries.

REMOVE the offensive example of accused sexual harasser. The fact you even USED that as an example, boggles the mind. I doubt I have enough space to unpack all the reasons why that is so wrong.

Put 501(c)(3) orgs on equal footing with big law firms by allowing them to hire legal counsel for whistle blowers.

Now is the time to be STRENGTHENING our ethical gaurdrails and to be putting in regulations that STOP corrupt practices and created full transparency. Restore the ethic rules that had been undermined during the last Administration and strengthen them so they aren't so easily circumvented in the future.

This regulation in its current form does none of that and it's failure is a perfect example of why the public has become so cynical (and antagonistic) towards Government and those who hold high positions within these institutions.

This is an opportunity to LEAD and restore a standard of INTEGRITY.
We MUST hold our officials to a higher standard, not create opportunities for bad behavior to be allowed or ignored.
Your job is to create ethical standards that PREVENT malfeasance. You act as Stewards on behalf of the CITIZENS of this Nation. NOT to create loopholes that allow bad faith actors to misuse their positions for personal gain.

Remember this.
Thank You.

Christine Joyce