From: Sherri Martz
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 9:37:03 PM

I oppose the OGE's proposed legal expense fund regulation as drafted.
1) Optional compliance is no ethics at all.
2) The proposed recusal requirement is inadequate and should be replaced 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;
3 Get rid of the offensive example regarding an accused sexual harasser;
4) Allow nonprofit charities (501(c)(3) organizations) to hire legal counsel for whistleblowers to level the playing field when dealing with large law firms.

Ethics should not be optional.