From: C Mitchell
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 9:02:39 PM

This email is to register my opposition to OGE's proposed legal expense fund regulation as drafted. The loopholes, exceptions, lax requirements, inappropriately short and easily manipulated recusal standards, and preferential treatment of certain entities make this basically the same as no regulation at all.
In particular OGE should:
- remove the exception that makes compliance with the regulation optional,
- replace the proposed recusal requirement with w 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.

Bottom line: ethics should not be optional, preferentially applied, or left to the individual judgement of the parties who stand to benefit from ethical lapses.
Thank you for reading.
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