From: Tamara Housh
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 9:16:11 PM

I oppose OGE's proposed legal expense fund regulation as drafted. New ethics rules should try to correct concerns, not create novel pathways to different corruption. It would be better if OGE did the below:

1. Remove the exception that makes compliance with the regulation optional;
2. 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;
3. Remove the troubling example involving an accused sexual harasser;
4. 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. There's no reason to treat them unequally.

Thank you for your time.
TMH

Sent from my iPhone