From: Debbie Billeter
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 6:20:01 PM

Regarding this regulation: if ethics are optional, then they are not ethical, and they might as well not be a regulation at all. It is also not ethical to use an offensive example in explaining a regulation, especially considering the high levels of sexual assault in the military that mostly goes unpunished. The regulation as written is ripe for corruption.

I oppose OGE's proposed legal expense fund regulation as drafted. OGE should make the following changes and corrections:

- remove the exception that makes compliance with the regulation optional;
- 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;
- remove the offensive example involving an accused sexual harrasser; 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.

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