From: Shelby Capacio
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 6:43:29 PM

As a citizen and resident of these United States, I would like to make it known that I object to the drafted language in OGE's proposed legal expense fund regulation. I oppose it in its current form and would not support it unless the following amendments are made:

1. Remove the exception making compliance optional. This nation deserves better than optional ethics. It is absurd to even consider such a thing. Do better henceforth, please.
2. Remove the offensive example involving an accused sexual harasser and recognize that sexual assault on U.S. property and by U.S. personnel is unacceptable.
3. Allow non-profits to level the playing field against large, moneyed law firms by allowing them to hire legal counsel for whistleblowers, who are less likely to be afforded similar resources.
4. Extend the proposed recusal requirement to include a 5-year recusal requirement which would prevent cash gifts from influencing and corrupting decisions, policies, and regulations affecting either parties involved or the industries in which substantial interests reside.

Again, without these changes, the proposal is toothless, and will be yet another signal that this nation is incapable of accountability that is meaningful and sustainable.

Sincerely,

Shelby Capacio