From: Debbie Notkin
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 6:23:04 PM

To the rulemakers at the Office of Government Ethics,

I oppose your proposed legal expense fund regulation as drafted. I respectfully request that you improve it in the following ways:

- make compliance with the regulation mandatory, not optional;

- expand the proposed recusal requirement into a broader 5-year recusal requirement that ensures that donors of cash gifts cannot influence decisions, policies, or regulations affecting themselves, their companies or the industries in which they have substantial interests;

- remove the unnecessary 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.

Unless you make these changes, the rule will continue to support massive corruption. Ethics should never be optional. Please do the right thing.

Debbie Notkin
kith@spicejar.org