From: Marin
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 6:10:25 PM

Good day,

I oppose OGE proposed legal expense fund regulation as drafted. OGE should:

- Remove the exception that makes compliance with the regulation optional - a regulation cannot by definition be optional, and ethical conduct by government officials certainly cannot be optional

- Replace the proposed recusal requirement with a broader five-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 interest

- Remove the offensive example involving an accused sexual harasser – what were you even thinking with that one?

- Place nonprofit charities on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers

Trust in US government officials, organizations, and processes is at an all time low, and for good reason. OGE has a critical role in reestablishing the trust that must exist in order for the United States to be fairly and lawfully governed. The regulation as proposed would not only not contribute to this effort, but would substantially undermine its own authority to enforce ethics regulation and policy going forward.

With respect,
Marin Paul