From: Rob Cunningham
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 3:02:29 PM

I deeply oppose the proposed legal expense fund regulation as drafted by the Office of Government Ethics. Your current version will not help produce the kind of ethical government we need; significant changes need to be made to your proposed regulation.

Here's what I strongly believe OGE should do in its revision:
• Remove the exception that says compliance with the regulation is optional
• Replace the proposed recusal requirement with a broader five-year requirement that prevents donors of cash gifts from influencing any decisions, any policies, or any regulations that impact them or the industries in which they have substantial interests
• Remove the offensive example involving an accused sexual harasser
• Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers

I hope you will give genuine consideration to making these changes so your office will fulfill its purpose and truly require ethical behavior from ALL of our government officials and agencies.

Sincerely,

Robert A. Cunningham
Lewiston, Idaho