From: Susan Darcy
To: USOGE
Subject: "Proposed Rule: Legal Expense Fund Regulation (RIN 3209–AA50)"
Date: Friday, June 17, 2022 3:07:55 PM

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

- 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 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.

I am extremely disappointed in the notion that your office thinks ethical behavior can be optional for public servants. There is nothing more important for a representative of the federal government to possess than high ethical standards. What is the purpose of having an Office of Government Ethics if their recommendations are merely suggestions? This needs to be changed.

Thank you,
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Sent from my iPhone