From:	Sonya Canavan
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Sunday, June 19, 2022 1:59:36 PM

Good afternoon,
I strenuously oppose OGE's proposed legal expend fund regulation as drafted. Compliance with ethics rules should NEVER be optional.

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 incredibly offensive example of the 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

Thank you,
Sonya Canavan