From: nephyr jacobsen
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Sunday, June 19, 2022 1:22:21 PM

Hello Good Office of Governmental Ethics Folks,

I'm writing to state that I oppose OGE's proposed legal expense fund regulation as drafted and would like to see it remove the exception that makes compliance with the regulation optional. This should not be optional.
Additionally,
• Please also replace the proposed recusal requirement with a stronger 5 year recusal requirement to prevent donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests.
• Please remove the example of an accused sexual harasser being able to raise funds.
• And please place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

You are the office of governmental ethics - please represent this by enforcing true ethics.

Many thanks,
-Nephyr Jacobsen

Nephyr Jacobsen
Director, The Naga Center
School of Traditional Thai Medicine
nagacenter.org
I go by she/her pronouns