From: Tina Bessias
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209–AA50)
Date: Monday, June 20, 2022 8:58:32 PM

We need a strong code of ethics to support our democracy! I therefore oppose OGE's proposed legal expense fund regulation as drafted.
In particular, I urge OGE to
* remove the exception that makes compliance optional;
* replace the proposed 1-year recusal "requirement" with a broader, firmer 5-year 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
* place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

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