From: Julie Dougherty
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 4:28:47 AM

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.

Citing the article I read this morning:

Walter Shaub asks the public to appeal "to the Office of Government Ethics with objections to a new Rule because it fails to fix a corrupt ethical practice begun in the Trump administration. The practice involves fund raising for government officials and others caught in ethics investigations. Not only could it facilitate defense costs of corruption, but also could be used to pressure witnesses by *withholding* funds. The current Office of Government Ethics has revised the Rule, but **has made compliance optional.**"

Julie Dougherty