From: George Erhard
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 12:25:36 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.

Making "ethics rules" optional in any context simply encourages non-ethical behavior on the part of our elected officials. We've already seen the damage possible when government officials are not held to account. The drafted regulation would allow more officials to break the rules, and hamstring any and all efforts to report issues.

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