From:	Lucia Hall
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Tuesday, June 21, 2022 12:31:49 AM

To whom it may concern:

I am deeply concerned that the Office of Government Ethics is willing to propose OPTIONAL ethics rules for top US officials concerning Legal Expense Fund Regulations. That is worse than no ethical rules at all, because the ethics can be ignored and still have things appear to be done according to ethical behavior. The American people deserve far better than this. And you should know better as well.

Please remove the exception that makes compliance with the regulation optional in the Legal Expense fund; please 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; definitely remove the offensive example involving an accused sexual harasser; and, finally, 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 very much for your time and attention to this matter. Please do the right thing!

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