From: Katherine Simmons
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 12:30:19 AM

I strongly oppose OGE's proposal for OPTIONAL ethics and accountability by government participants.

The OGE should amend the proposed legal expense fund regulation as drafted in order to:

- 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.

I will be following the process of promulgating these regulations and look forward to OGE establishing legally binding ethical standards for the American government organization, and accountability by donors and others who aspire to participate in it.