From: Stephanie Nugent
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 6:53:46 AM

To the Office of Government Ethics:

I am writing to oppose the proposed revision of the legal expense fund regulation making compliance optional. The following emendations must be considered, weighed, and put in place if we are to keep our democracy viable and growing for our children and grandchildren.

- 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.

Stephanie Nugent
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