From: Mary Pat Brennan
To: USOGE
Subject: Fwd: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Saturday, June 18, 2022 7:20:11 PM

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From: **Mary Pat Brennan** <marypatbrennan@gmail.com>
Date: Fri, Jun 17, 2022 at 12:38 PM
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
To: <ContactOGE@oge.gov>

To Whom It May Concern,

I find it deeply offensive that OGE is proposing ethics rules that are optional. I oppose OGE's proposed legal expense fund regulation as drafted. OGE should instead: - 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.

These steps will help shape a fairer, safer and more transparent process.

Thank you for your attention and consideration.

Sincerely,
Mary Pat Brennan