From: Debbie Seltzer
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Saturday, June 18, 2022 2:15:39 PM

To Whom it May Concern: I strongly oppose OGE's proposed legal expense fund regulation as drafted. To ensure the regulation functions effectively, 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.

Data on voter attitudes and concerns in the U.S. consistently shows high levels of voter apathy and distrust precisely because public officials are benefiting economically from elected office rather than serving the interests of the public. Reliable studies further show that we no longer have a functioning democracy, but rather are an oligarchy, due to the lack of effective ethics regulations and enforcement. These changes are desperately needed to move us toward a functional and effective system that actually complies with democratic principles.

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