From: Steve Scalmanini
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209–AA50)
Date: Saturday, June 18, 2022 3:57:14 AM

I absolutely oppose OGE's proposed legal expense fund regulation as drafted, and I am stunned that the draft regulation includes an exception that would make compliance optional. What were you thinking?

OGE should do the following:

- 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.

Just say no to optional government ethics. If we're ever going to root out corruption and hold those in power accountable for unethical practices, it won't happen by giving them the ability to opt out.

Sincere regards,

Stephen G. Scalmanini
907 N Oak St
Ukiah, CA 95482