From: Carolyn Stevens
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Saturday, June 18, 2022 7:13:36 AM

To Whom it May Concern:

I am writing to make it abundantly clear that I oppose OGE's proposed legal expense fund as drafted. 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 harrasser; 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.

That ethics could even be *considered* to be optional in these times is reprehensible. We the people are held to higher standards than our elected officials. This proposed regulation as currently written is *shameful*.

I and my family hope you revise the proposal as stated above.

Thank you,
Carolyn Stevens
Birmingham, MI