From: bmmasson-churin@rcn.com
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Saturday, June 18, 2022 3:27:11 PM

I oppose the Office of Governmental Ethics's (OGE) proposed legal expense fund regulation as drafted. The proposed regulation should be amended as follows:

1. Remove the exception that makes compliance with the regulation acceptable;
2. Replace the proposed recusal requirement with a broader five-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;
3. Remove the offensive example involving an accused sexual harasser; and
4. Place non-profit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Very truly yours,

Bobette M. Masson-Churin, Esq.