From: Margaret Williams
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50
Date: Saturday, June 18, 2022 11:08:20 AM

As a former Government employee, I have always been proud of our ethics rules.
Please fix this rule so that it ensures appropriate Government Ethics for top officials.

I oppose OGE's proposed legal expense fund regulation as drafted. OGE should:

1. Remove the exception that makes compliance with the regulation optional; (*can't believe I am having to say this one*)

2. 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;

3. Remove the offensive example involving an accused sexual harasser; (not needed or helpful)

4. Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers. (Yes, PLEASE!)

Thank you for your time and effort in reading my response to this rule and please let's all work together to ensure our government is Ethical.