From: Liz Sufit
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Saturday, June 18, 2022 10:14:58 PM

To Whom it May Concern:

I am writing in opposition to the OGE's proposed legal expend fund regulation as drafted.

In order to achieve and maintain clear and strong ethics guidelines, the OGE should remove the exception that makes compliance to the regulation optional. What is the use of a regulation if it is optional? It allows people to skirt the ethics statement.

The OGE should replace the recusal requirement that is proposed with a broader 5 year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, etc that affect them or their industry. Enough of the "revolving door" of government and lobbyists.

The OGE should allow non-profit organizations [501(c)3] to hire legal counsel for whistleblowers, putting them on a level playing field with large law firms.

The OGE uses an offensive example - with an accused sexual harasser involved . This should be struck from the regulation.

Thank you
Elizabeth A Sufit, DVM
Concerned Citizen