From: William Stapleton
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Saturday, June 18, 2022 2:19:45 PM

I oppose OGE's proposed legal expense fund regulation as drafted. All of the points I have made are essential, but the first is especially essential. How an ethics rule can be made optional is TOTALLY LUDICROUS. The rule, presumably is designed to prevent existing abuse. To make the rule optional mean ms an abuser is being told it is okay to carry on the abuse. Anyone with half a functioning brain cell MUST be able to see that, surely!?!?

So here is my list of points:

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 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.

Yours,

William Stapleton.