From: J. Klavens
To: USOGE
Subject: I oppose the OGE's proposed legal expense fund regulation as drafted. +++
Date: Saturday, June 18, 2022 9:51:39 AM

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

-- remove the exception that makes compliance with the regulation optional;

-- 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;

-- 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.

It's appalling and alarming that anyone would think that ethical behavior should be optional for elected officials in a democracy, or that any governmental body would create a two-tiered, or loophole-laden, code.

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