From: Bruce Hlodnicki
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 11:37:03 AM

I absolutely oppose the OGE's proposed legal expense fund regulation as drafted. COMPLIANCE WITH GOVERNMENT ETHICS REQUIREMENT CANNOT BE AT THE DISCRETION OF THE EMPLOYEE! They MUST be universally enforced on everyone!

OGE MUST:
1) Remove the exception that makes compliance with the regulation optional;
2) Replace the proposed recusal requirement with a broader 5-year recusal requirement that keeps 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;
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.