From:	marci mckenna
To:	USOGE
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Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Tuesday, June 21, 2022 1:40:20 PM

I oppose 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 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.

It would be just great if the "Office of Government Ethics" could serve the function of furthering actual ethical behavior. I think we've seen that internal motivation to do so is lacking in many cases and thus that making compliance "optional" will not aid in that objective.

Thank you,

Marci McKenna
Taxpayer