From: David
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 1:42:03 PM

Greetings,

I understand that there is a potential rule change being proposed that makes the ethics relating to fundraising for government employees who could be under investigations "optional". This strikes me as a terrible position. Ethics in government should not be optional. Period. Our government officials should be held to the highest standards of fairness and ethics. The very *appearance* of conflicts of interest should not strongly discouraged if not forbidden. Government employees who violate rules and ethics policies should shoulder the consequences and burden of their actions. As such, 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.

Thank You,

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