From: John M. Burt
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 1:57:26 PM

To the Office of Government Ethics:

I oppose OGE's proposed legal expense fund regulation as drafted. Rather than adopt this proposed regulation, OGE should:

- 1: Remove the exception that makes compliance with the regulation optional;
- 2: Replace the proposed recusal requirement with a recusal requirement of at least five years that prevents donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests;
- 3: Remove the repugnant example involving an accusation of sexual harassment; and
- 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.

-- John M. Burt