From:	Robert H Stiver
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Tuesday, June 21, 2022 1:56:05 PM

I strongly oppose the OGE's proposed legal-expense-fund regulation as drafted. OGE should -- I say *must*, and with urgency/immediacy:
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 prevents donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests (memo: *surely* "substantial" must be given some substantiality in order to make the qualifier stringent/meaningful);
3) Remove the offensive example involving an accused sexual harasser;
4) Place nonprofit charities (501(c)(3) organizations) on an equal standing/basis with large law firms by allowing them to hire legal counsel for whistleblowers.
Take this "foursome" of gravitas and merit and crucial import -- and 'run'.ethically.with.each.of.them! I *demand* your *responsive* and *ethical* action on behalf of all "We, the People" Americans who are fed up with venality, greed, poor governance, and a shameful disassociation of officials with *ethical behavior*!
Thank you and aloha from Hawaii.