From:	Wayne Greenwood
To:	Contact OGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Thursday, June 16, 2022 5:48:10 PM

Hello-

I oppose OGE's proposed legal expense fund regulation as drafted. In particular, ethics rules should not be optional. Otherwise, what's the point? 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
- Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers

I'm typing this during the Jan 6 hearings, and it seems clear that government officials should be held to higher—not lower or optional—standards.

Sincerely,

Wayne Greenwood