From: Martha Stearns
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 5:18:46 PM

To the rulemakers at the Office of Government Ethics,

I'm writing to say that I strongly oppose OGE's proposed legal expense fund regulation as drafted.

OGE should:

- Remove the exception that makes compliance with the regulation optional. Complying with rules aimed at ensuring members of the government can't cheat or profit from the deviation from their governmental roles should never be optional.

- Replace the proposed recusal requirement with a broader 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.

- 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.

The proposed wording of the rule contains giant loopholes that will allow for massive corruption. America deserves better than "optional" ethics for top officials. Please rewrite this rule to ensure that officials in the US government must behave honorably and in the way citizens are expected to act!

Thanks.

Martha Stearns

Sent from my iPad