From: Mary Garvin
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)"
Date: Friday, June 17, 2022 10:02:56 AM

I oppose the above reference proposed rule, as written. As a former federal employee, ethics rules should be mandatory.

Specifically, I recommend the following changes be made.
Remove the exception that makes compliance w the regulation optional.
Replace the proposed recusal requirement w 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 example involving an accused sexual harasser. It is offensive and wholly inappropriate, particularly in the context it is used.
Place non-profit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Thank you for the opportunity to provide comment on this very important regulation.

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Sent from my iPhone