From: cm piazza
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 11:50:21 AM

To Whom it May Concern,

I oppose OGE's proposed legal expense fund regulation as drafted. I'm particularly appalled that ethics are optional in the draft.

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; and
- place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

These changes will create a more fair and transparent process.

Thank you,
Camille Piazza

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"The cinema is truth 24 frames per second"
-Jean-Luc Godard
"Experience is simply the name we give our Mistakes."
- Oscar Wilde
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