From: Ken Brucker
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209–AA50)
Date: Friday, June 17, 2022 10:25:11 AM

I oppose OGE's proposed legal expense fund regulation as drafted. An optional measure will be ineffective in driving the desired ethical behavior. Ethical behavior should not be optional.

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.

Kenneth Brucker
1765 Burbury Way
San Marcos, CA 92078