From: Donna Emerson
To: Contact OGE
Subject: "Proposed Rule: Legal Expense Fund Regulation (RIN 3209–AA50)"
Date: Friday, June 17, 2022 10:43:12 AM

I ***oppose OGE's proposed legal expense fund regulation as drafted. 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.

While the above content wording specific was obviously suggested by POGO, I ENTHUSIASTICALLY support every word & it's intent! Given the precarious state of our democracy- having been shaken to the core by our previous administration - we need to strengthen ethics rules at every juncture, and in doing so, not WEAKEN them as gaps in this proposed rule may allow.
Sincerely,
Donna Emerson