From: Carol Moore
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Friday, June 17, 2022 11:07:04 AM

Corruption threatens to destroy American democracy. We must strengthen ethics rules and enforce them vigorously. For that reason, I oppose the current draft of OGE's proposed legal expense fund regulation. As written, this regulation lacks both substance and effect.

To strengthen the draft regulation, OGE should:

- make compliance MANDATORY and remove any exception that makes compliance with the regulation optional;

- lengthen the period of required recusal to at least 5 years and prevent 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

- permit nonprofit charities (501(c)(3) organizations) to hire legal counsel for whistleblowers.

Sincerely,
Carol Moore