From: James Stewart
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Monday, June 20, 2022 8:49:22 AM

Office of Government Ethics:

I am writing to express my opposition to OGE's proposed legal expense fund regulation as drafted. I request that OGE should make the following revisions:

- 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 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,
James A. Stewart

Sent from Jim Stewart's iPad