From: Martin Moran
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Monday, June 20, 2022 8:56:41 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.
- Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

It is a shame that an ethics rule can be deemed “optional”.

Thanks

Luis M Moran