From: jason fordham
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Monday, June 20, 2022 3:10:46 PM

Hi OGE,

If ethical rules are optional, then they aren't rules, and they don't enforce ethical behavior.

I therefore 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.

Thank you

Jason Fordham

(Forwarded to contactoge address because of reports that usoge may bounce)