**From:** Barbara Stoff
**To:** Contact OGE
**Subject:** Proposed Rule: Legal Expense Fund Regulation(RIN 3209-AA50)
**Date:** Thursday, June 16, 2022 3:41:15 PM

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As a member of the public and a public employee myself, I'm appalled at some of the language in the proposed Legal Expense Fund Regulation.

I would like to go on record as opposing OGE's proposed legal defense fund regulation as it's currently drafted.
OGE should do the following:

- Remove the exception that would make 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

Part of the reason why so many people within our general public have distrust of federal employees and federal politicians is because all too often the ethics regulations that are supposed to keep everyone honest, have too many loopholes, no real penalties, and/or are not enforced. I've seen stronger ethics regulations at state levels. Federal levels should be the same or higher. Please do better.

Sincerely,
Barbara Stoff
New Jersey Resident