**From:** kdulgar@aol.com
**To:** Contact OGE
**Subject:** Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
**Date:** Thursday, June 16, 2022 3:20:53 PM

---

Optional ethics is not ethical!

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; and
- place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Signed
Kim Dulgar