From: Charles Scanga
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209–AA50)
Date: Friday, June 17, 2022 1:47:58 PM

To whom it may concern,
As a former US government employee (NIAID, NIH, HHS), I operated under a strict series of ethical guidelines. I was happy to do so because I recognized that my salary came directly from the US taxpayers and I was ultimately accountable to each and every one of them. This is the essence of "public service".

I now understand that OGE is proposing a rule change. I hereby state my opposition to the 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.

Thank you for considering my email.

Sincerely,
Charles A. Scanga, Ph.D.
Gibsonia, PA