From: Nancy Gerth
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209–AA50)
Date: Friday, June 17, 2022 12:43:25 PM

Dear OGE regulators,

Please do not begin to gut the regulations you enforce by turning making
Proposed Rule: Legal Expense Fund Regulation (RIN 3209–AA50)
a suggetion instead of a regulation. What is a regulation if compliance is optional?

You could achieve the same end by making recusal a broader 5-year requiremnt. I'm not convinced tht nonprofit charities should remain on such unequal footing with large law firms in their abiliity to hire legal counsel for whistleblowers. That seems like it's backwards.

I was upset that you used an exampe involvig a accused sexual harrasser, having been abused myself.

Optional ethics is a contradiction in terms and may ultimately resultin your agency losing the ability to regulate at all.

Thank you for your time. We depend on you.
Nancy Gerth
Sagle ID