From: Val Giddings
To: Contact OGE
Subject: "Proposed Rule: Legal Expense Fund Regulation (RIN 3209–AA50)"
Date: Friday, June 17, 2022 12:17:52 PM

I oppose OGE's proposed legal expense fund regulation as drafted. OGE should:

1. remove the provision allowing compliance with the regulation to be optional;

2. change to proposed recusal requirement to a broader, 5-year recusal requirement that would prevent donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests;

3. remove the offensive example involving an accused sexual harasser; and

4. place non profit charities (501(c)(3) entities(on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

OGE must *say no to optional government ethics*. If we're ever going to root out corruption and hold those in power accountable for unethical practices, it won't happen by giving them the ability to opt out.

Thanks.

L. Val Giddings