From: jennifer jcarole.com
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 11:26:18 AM

Members:

I oppose OGE's proposed legal expense fund regulations as drafted!

OGE should (must!):

Remove the exception that makes compliance optional. I mean why even bother do all this work if compliance isn't expected. And based on the state of things today, compliance is essential.

Replace the proposed recusal requirement with a broader, five year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, or regulations affecting or the industries where they have an interest. This is critical if this truly intends to limit corruption.

Remove the incredibly offensive example involving an accused sexual harraser. As a survivor, I can't even....

Place nonprofit charities, 501(c)3 organizations, on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers. I mean dammit, level the playing field at least. We used to protect people trying, desperately trying, to do the right thing.

I look forward to your commitment to equity, the Constitution and the law, and ethics. Accountability is needed now more than ever as corruption has become de riguer.

Sincerely,

Jennifer Carole

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