From:	Pat Hughes
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Tuesday, June 21, 2022 11:22:36 AM

Hello,
I have read about the OGE's proposed adoption of a Rule setting up regulation of legal expense funds. I oppose this regulation as drafted because:
1. Making compliance optional is a joke. Make rules people will follow, because the most unscrupulous actors will choose to not be compliant, and money will flow to them and the rule will not change anything with the current legal expense funds legal terrain.
2. The recusal provision is a joke. This needs to be a 5-year recusal requirement.
3. The way the proposed Rule treats nonprofit 501(c)(3) organizations (who could legally backstop a whistleblower e.g.) more strictly than for profit law firms is a joke.

Americans need ethics regulations for their government that instill ethical behavior. Doing so on an optional basis makes a mockery of "good governance". Please remand this rule and change it.

Regards,

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