From:	Jay Gerak
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209–AA50)"
Date:	Tuesday, June 21, 2022 11:09:03 AM

Dear Office of Governmental Ethics:

I would like to register my concerns regarding the OGE's proposed legal expense fund regulation as drafted.

OGE needs to amend its draft to:

(1) remove the exception that makes compliance with the regulation optional - IT SHOULD BE MANDATORY!;

(2) replace the proposed shorter and more narrow 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;

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

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

It is vital for our ethics laws to have teeth and be mandatory on our legislators and their staffs.

Sincerely,

Justin A. Gerak
Chicago, IL