From: Cynthia Gould
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209–AA50)
Date: Tuesday, June 21, 2022 11:02:05 AM

I oppose OGE's proposed legal expense fund regulation as drafted. Ethics cannot be optional. OGE should:

- **remove the exception that makes compliance with the regulation optional;**
- **replace the proposed 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;**
- **remove the offensive example involving an accused sexual harasser; and**
- **place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.**

Cynthia Gould

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