From:	Patricia Harlow
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Tuesday, June 21, 2022 11:05:07 AM

I oppose the OGE's proposed legal expense fund regulation as drafted. OGE should:
1) Remove the exception that makes compliance with the regulation optional;
2) 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;
3) Remove the offensive example involving an accused sexual harasser;
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.
We cannot hold government officials accountable for unethical practices if they can opt out. As a former FDA employee who was subject to strict ethics rules, I expect the OGE to fix its regulation and close all the nonsensical loopholes. Furthermore, ethics rules should apply to all who work in government, including the Supreme Court.