From:	Kathy Richmond
To:	Contact OGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Thursday, June 16, 2022 1:48:57 PM

To the rule makers at the Office of Government Ethics,

I oppose OGE's proposed legal expense fund regulation as drafted.

OGE should:

- remove the exception that makes compliance with the regulation optional;
- replace the proposed recusal requirement with a broader 5-year recusal requirement to prevent 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.

> Without making these changes, the rule contains giant loopholes that allow for massive corruption. America deserves better than optional ethics for top officials! Please rewrite this rule! Make it better!
>
> Sincerely,
>
> Kathy Richmond
>
> San Jose, CA