From: kworthing@aol.com
To: Contact OGE
Subject: "Proposed Rule: Legal Expense Fund Regulation (RIN 3209–AA50)"
Date: Thursday, June 16, 2022 1:07:12 PM

I am writing as a concerned citizen. I recently heard about the OGE's draft regarding legal expense fund. 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 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.

I have been involved in organizations that had ethics standards. None of them were optional. I for one want corruption removed from our government. This ethics standard would say if you get caught you can opt out. Is this your oops, I want a do over? In law, if you are found guilty, you can't say oh, never mind and be allowed to not have a penalty. Ethics are given so you know what is expected and penalties are frequently very severe depending on the offense. The people serving in government know what is right and wrong but the ethics standards tell them there are consequences. I can only hope you use common sense on this issue and have no "if you want to" in the requirements.

Thank you for your time and hopefully swift corrective action.

E.K.Worthington, MD