From: Lilly KP
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 1:34:49 PM

I vehemently oppose OGE's proposed legal expense fund regulation as drafted. The idea that such important regulation should be optional is ludicrous to the point of pointlessness. If OGE's goal is to prevent corrupt actions, conflicts of interest, and other such reprehensible behavior in our government, these regulations must be strong, final, and legally binding. As it stands, this proposed rule is clearly a pandering pat on the back for those US inhabitants who object to such slimy, stinking behavior from our lawmakers -- but it is cold comfort when those who are defrauding the American people of transparent government practices are free to continue to do so with impunity. We do not need to be pandered to; we need OGE to serve its purpose and regulate the offices which are under its jurisdiction. An optional regulation is no regulation at all.

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 hope you take my criticisms as a voter, citizen, and moral person to heart. I truly believe that OGE has the opportunity to change the American government for the better once this act has been revised. In fact, it has both a moral and legal imperative to do so.

Regards,
Lilly Keefe-Powers