From: Cynthia Guggemos
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209–AA50)
Date: Thursday, June 16, 2022 12:16:07 PM

To the OGE,

A regulation that is optional is really no regulation at all. We need very strict and firm ethics in our government. I oppose OGE's proposed legal expense fund regulation as drafted.

Instead, 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, priorities or regulations affecting them or the industries in which they have substantial interests.

3) Place nonprofit charities (501 (c) (3) organizations) on an equal footing with large law firms by allwing them to hire legal counsel for whistleblowers.

Also, please remove that offensive example involving an accused sexual harasser.

Thank you most sincerely,

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