From: JC Maly
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209–AA50)
Date: Tuesday, June 21, 2022 4:31:57 PM

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.

Tell OGE to *say no to optional government ethics*. If we're ever going to root out corruption and hold those in power accountable for unethical practices, it won't happen by giving them the ability to opt out.

Josepha C Maly
3543 15th Ave S
Minneapolis, MN 55407-2226

612-729-7437