From: Catherine Daligga
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 4:02:35 PM

I oppose the regulation language in its current form.

Instead, OGE should take these two steps to eliminate key loopholes:
1. Make compliance OBLIGATORY not optional;
2. Expand the recusal requirement for five years, to prevent donors from being able to exercise undue influence on their own or related entities' behalf.

In addition, the current draft should be edited to remove the offensive example of sexual harassment.

Lastly, the regulation should allow nonprofit entities (with 501c(3) status) to hire legal counsel for whistleblowers, to permit them a fair chance of standing up against privately funded, deep-pocketed organizations able to pay for high-powered legal representation.

Please take the time and make the effort to raise the ethical standards in this circumstance to the necessary level. The federal OGE must use every opportunity to prevent corruption. The people of the US are counting on you to follow through appropriately and completely, not in a careless way.

Thank you.

Sincerely,

Catherine E. Daligga, Ph.D.
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