From: Jennifer Levinson
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 4:36:53 PM

I learned today that you have a new rule before you that allows for continued fundraising for government officials under an ethics investigation. Your attempt to revise and correct this potentially corrupt practice will now be optional for compliance? That is ridiculous and unacceptable. Are you in the business of promoting or curtailing corrupt practices?

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.

Sincerely,
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