From: Toddy Perryman and Pat Leonard
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 4:37:39 PM

I am disturbed about the corruption of the government by people who are using their influence via money or inappropriate pressure.

Ethics regulations should not be optional. This would mean that only the ethical legislators and officials would follow the rules and the unethical ones could claim the rules are not compulsory.

I am also particularly concerned about legal counsel for whistleblowers. This is essential. Citizens doing their best to protect everyone by reporting abuses need to be protected.

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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