From: Eric Edlund
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 4:41:43 PM

I oppose OGE's proposed legal expense fund regulation as drafted.
OGE should:

- most importantly, ensure that compliance with the regulation is required, not optional, for federal officials;
- extend and expand the recusal requirement to five years in which donors of cash gifts are meaningfully prohibited 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 (in this scenario, ethics rules should not be waived for the accused person, who can provide for his or her own legal assistance the same way as ordinary people without political connections ;
- allow nonprofit charities (501(c)(3) organizations) to hire legal counsel for whistleblowers, ensuring them an equal footing with large law firms and other well-funded entities.

I am pleased to see OGE working on this critical issue, but the problems noted here are more than just "loopholes", they would fatally weaken the entire regulatory framework.

Sincerely,
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