Legal Expense Fund Regulation: Public Meeting
U.S. Office of Government Ethics
October 17, 2019

Agenda

I. Introduction
   a. Roundtable Introductions
   b. Background / Status of Rulemaking
   c. Purpose of Meeting

II. Discussion of issues related to legal expense funds
   a. Scope of a legal expense fund regulation, including:
      i. Other possible sources of legal expense payments or legal support (e.g., pro bono assistance, established legal aid providers) outside of a legal expense fund; and
      ii. The types of legal matters to be covered by a legal expense fund regulation if the employee seeks to raise funds for legal expenses arising from those legal matters.
   b. Structure of a legal expense fund, including:
      i. Number of eligible beneficiaries for a legal expense fund;
      ii. Legal structure used to establish a legal expense fund (e.g., trust, limited liability company, etc.); and
      iii. The possibility of different rules for different types of employees.
   c. Other issues

III. Conclude Meeting
   a. Reminder: Comment period open until Nov. 5
## Attendees

<table>
<thead>
<tr>
<th>Name</th>
<th>Affiliation</th>
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<tbody>
<tr>
<td>Holman, Craig</td>
<td>Public Citizen</td>
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<td>Marsco, Delaney</td>
<td>Campaign Legal Center</td>
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<td>Canter, Virginia</td>
<td>Citizens for Responsibility and Ethics in Washington (CREW)</td>
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<td>Snellen, Jeremy</td>
<td>Department of the Navy</td>
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<td>Doyle, Ken</td>
<td>Bloomberg Government</td>
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<td>Hermanowicz, Rebecca</td>
<td>Department of Commerce</td>
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<td>Cox, Kerri</td>
<td>Office of the Director of National Intelligence</td>
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<td>Lezra, Gabe</td>
<td>CREW</td>
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<td>Ramseyer, Lily</td>
<td>CREW</td>
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<tr>
<td>Lerner, Meredith</td>
<td>CREW</td>
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Topics Discussed

I. Scope
   a. Other possible sources of legal expense payments or legal support outside of a legal expense fund
      i. Pro bono services
      ii. Discounted legal services
      iii. Crowdsourcing
      iv. Personal relationship gift exception
      v. Organizations that provide legal services or funding unrelated to status as a federal employee
      vi. Employee organizations and unions
      vii. Former employers
      viii. Employee insurance
   b. The types of legal matters to be covered by a legal expense fund regulation if the employee seeks to raise funds for legal expenses arising from those legal matters.
      i. Arising from official position
      ii. Differentiating between personal matters and official matters
      iii. Arising from candidacy or election
      iv. Arising from service on a transition team

II. Structure of a legal expense fund
   a. Number of eligible beneficiaries for a legal expense fund
      i. Sole beneficiary versus multiple beneficiaries
      ii. The possibility of different rules for different types of employees
   b. Legal structure used to establish a legal expense fund
      i. Trust versus other forms (LLC, crowdsourcing)
   c. Cost for employees to establish a trust

III. Limitations on the types of donors and amount of donations to legal expense funds
   a. Use of “prohibited source” definition versus list of types of prohibited donors
   b. Organizations versus individual donors
   c. Contribution limits

IV. Agency oversight roles related to an employee’s legal expense fund