From:	Robert Rutkowski
To:	Contact OGE
Cc:	Keith Abouchar
Subject:	Comment on Proposed “Legal Expense Fund Regulation”
Date:	Thursday, June 13, 2019 4:43:46 PM

Hon. Emory A. Rounds, III,?? Director
U.S. Office of Government Ethics
1201 New York Avenue, N.W., Suite 500
Washington, DC 20005
Email: ContactOGE@oge.gov

Re: Comment on Proposed ???Legal Expense Fund Regulation???

Dear Director:

The Office of Government Ethics (OGE) must promulgate rules governing the recent proliferation of legal expense funds within the executive branch.

The funds are set up by government officials in legal trouble to raise money from private sources to help pay for legal expenses. They are largely unregulated for executive branch officials.

New rules, at a minimum, should require a $5,000 limit on contributions, a prohibition on donations from those with business pending before the government official and a requirement for full transparency of the sources of funds and expenditures. Also mandate that each official may create only one legal expense fund to ensure accountability.

Previously these funds were set up so rarely, and voluntarily disclosed their finances, that the OGE felt tougher regulations were unnecessary.?? But in the Trump administration these slush funds are popping up everywhere, and each one plays by its own rules of how much money they take from which sources and whether to disclose any of this to the public.

In September 2017 Public Citizen filed a petition for rulemaking on legal expense funds for the executive branch with the OGE. The agency is currently undertaking such rulemaking.

Government officials facing costly legal expenses are particularly desperate for donations from others to cover those expenses. This desperation provides a perfect window for special interests with business pending before that official to buy favors through large donations to pay for legal expenses.

Congress has a long history with congressional legal expense funds, and so both the House and Senate have developed strict rules establishing contribution limits, banning donations from certain potentially corrupting sources such as lobbyists and foreign principals, and requiring quarterly disclosure of contributions and expenditures. The OGE should do the same for the executive branch.

Yours sincerely,
Robert E. Rutkowski

cc:
Representative Steny Hoyer
House Majority Leader
Legislative Correspondence Team
1705 Longworth House Office Building
Washington DC 20515
Office: (202) 225-4131
Fax: (202) 225-4300
keith.abouchar@mail.house.gov

2527 Faxon Court
Topeka, Kansas 66605-2086
P/F: 1 785 379-9671
E-mail: r_e_rutkowski@att.net

Re: Public Citizen comments:
https://www.citizen.org/article/public-citizen-comment-on-proposed-legal-expense-fund-regulation/?eType=EmailBlastContent&eId=50380bc8-32c4-48ed-a5f3-b96c6af72b42