From: Bev Cummings
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Tuesday, June 21, 2022 10:16:10 AM

I was truly hoping the office of Government ETHICS (!) would propose regulations that make it more difficult for wealthy and well connected individuals and corporations to exploit legal expense funds for their corrupt benefit. But as always (sigh) I am disappointed in the proposed rulemaking. OGE should

Remove the exception that make the compliance optional (seriously???)
Include a broader 5 year recusal requirement that stops donor from influencing decision makers in industries where they have an interest
Allow non-profit charities to hire legal counsel for whistle blowers

In addition, there are no words that I can politely use in this email to express my furor that a senior military officer who is being court martialed for sexual harassment could therefore raise funds to fight the accusations!

This should be no OPTIONAL government ethics rules as proposed in legal defense fund regulation. Optional ethics are NOT ethical. As if that even needs to be said.

Beverly Cummings