From: Hal Peterson
To: USOGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Sunday, June 19, 2022 10:55:04 AM

Dear Office of Government Ethics:

I write **in opposition to** the proposed regulation of legal expense funds, as currently drafted. The exceptions are so broad and requirements so weak as to render the proposed regulation useless. The regulation must be improved in a number of areas:

- Compliance must be mandatory to be meaningful. If an official were inclined to abuse the system in the ways this regulation purports to restrict, then surely they would simply recuse themselves and move on with whatever shady dealings they had in mind.
- The footing for funding legal counsel should be equal between 501(c)(3) organizations helping whistleblowers and big law firms.
- The recusal requirement should be longer, perhaps five years, perhaps more; also broader.
- The example of an accused sexual harrasser is egregiously offensive.

Thank you for your attention. I hope that your revision of this regulation fixes its problems and turns it into a tool to keep our government clean.

--
Hal Peterson, sower of sunsets, reaper of dreams