From: anne vebeliunas
To: USOGE
Subject: "Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)"
Date: Monday, June 20, 2022 7:59:26 PM

The proposed Legal Expense Fund Regulation as drafted does not address the problem and even encourages unethical behavior and corrupt practices. It is unacceptable and should be corrected.

OGE should remove the provision for optional compliance. Compliance with a regulation can only be mandatory, otherwise it does not regulate anything.

OGE should implement a 5 year recusal requirement to prevent donors from influencing decisions or policies that affect their personal interests or the interests of specific industries, individuals or other entities that provided the funding for the donations.

OGE should stipulate that the accused sexual harasser mentioned as an example could not use such funding.

OGE should allow non-profits to hire legal counsel for whistleblowers, or require law firms that receive funding from foreign governments or private individuals to be barred from defending accused public officials without specific approval and guidance from the relevant court or entity that will decide the case.