From:	Christopher Cutler
To:	USOGE
Subject:	Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date:	Tuesday, June 21, 2022 10:58:22 PM

Dear Office of Government Ethics,

I am writing to you today to oppose OGE's proposed legal expense fund regulation as drafted because it essentially makes obeying the regulation optional. There should be no option for government officials in the executive branch to behave ethically when they are funding legal expenses — they should be required to structure these funds as trusts as has been done in the past.

I would like to see the OGE make these changes:

- Most importantly, remove the exception that makes compliance with the regulation optional. The existing practices are unethical and create avenues for corruption.
- Replace the proposed recusal requirement. The current recusal period is too short and again creates opportunities for corruption. Instead, I would like to see a broader 5-year recusal requirement that prevents donors to the legal expense fund from influencing policies, regulations, or executive orders that affect them or their businesses and/or industries.
- Make nonprofits and charities (e.g. 501(c)(3) organizations) equal to large law firms who are supporting government officials by allowing them to hire legal counsel for whistleblowers.

Thank you for considering these objections.

Yours sincerely,
Christopher Cutler
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