From: Edie Babbe
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 2:38:53 PM

Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)

OGE Personnel,

I am shocked to learn the details of OGE's proposed legal expense fund regulation (RIN 3209-AA50). The current draft makes its adherence optional, has a recusal period of only 1 year, allows senior military officers accused of sexual harassment to raise money for their defense (allowing even more harassment), and allows large law firms to provide unlimited legal support to officials, but limits nonprofits from hiring lawyers for whistleblowers.

I oppose the current draft of the regulation. There are way too many loopholes allowing for massive corruption. I strongly encourage the regulation be amended to:

- Remove the exception that makes compliance with the regulation optional
- Replace the proposed recusal requirement with a broader 5-year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests
- Remove the offensive example involving an accused sexual harasser
- Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

Thank you, Eda Babbe